

**SUBSTANTIAL OR CONTROVERSIAL DEVELOPMENT OR DEPARTURES
FROM POLICY**

<u>No:</u>	BH2010/03259			<u>Ward:</u>	MOULSECOOMB & BEVENDEAN
<u>App Type:</u>	Full Planning				
<u>Address:</u>	The Keep, Woollards Field, Lewes Road, Falmer, Brighton				
<u>Proposal:</u>	Construction of a 1-3 storey archive centre comprising lecture and educational facilities, reading room, conservation laboratories, archivist study areas, offices, cleaning and repair facilities for archives, repository block and refreshment area. Associated energy centre, car, coach and cycle parking, waste and recycling storage, landscaping including public open space and access.				
<u>Officer:</u>	Maria Seale, tel: 292322	<u>Valid Date:</u>	15/10/2010		
<u>Con Area:</u>	Adjoining Stanmer	<u>Expiry Date:</u>	14/1/2011		
<u>Agent:</u>	Kier Southern, Longley House, International Drive, Southgate Avenue Crawley				
<u>Applicant:</u>	East Sussex County Council, County Hall, St Annes Crescent, Lewes				

1 RECOMMENDATION

That the Committee has taken into consideration and agrees with the reasons for the recommendation set out in paragraph 8 of this report and resolves that it is **MINDED TO GRANT** planning permission subject to the applicant entering into a Section 106 Obligation to secure the following:

Section 106

- **Sustainable transport enhancements** including disabled access; bus stop enhancements; real-time bus information; a fallback payment of £28,000 towards other sustainable measures if these bus stop improvements cannot be implemented; pedestrian and cycle link improvements.
- **Travel Plan.**
- **Highway works** comprising installation of a loop on the A27/A270 slip road designed to control vehicle queue lengths.
- **New public informal open space** provision including maintenance for first 5 years then transferral to Council ownership plus sum of £13,781 for further 25 years maintenance.
- **Construction environmental management plan (CEMP).**
- **Local training and employment strategy** to include a commitment to employing 20% of construction workforce from the local area.
- **Public art** provision on the front elevation of the building to an equivalent cost of £12,000.

and to the following Conditions and Informatives:

Conditions

Regulatory Conditions:

1. BH01.01 Full Planning.

2. The development hereby permitted shall be carried out in accordance with the approved drawings no.PL01(B), PL02(E), PL03(E), PL04(E), PL05(D), PL06(D), PL08(C), PL10(C), PL11(C), PL12(D), PL13(C), PL14(C), PL15(C), PL16(D), PL17(B), PL18(B), PL19(B), PL20(C), PL21(C), PL23(C), PL24(B), PL25(D), PL26(D), PL27(C), PL28(C), PL29(D), PL30(D), PL31(D), PL32(D), PL33(C), PL34(C), PL35(C), PL37(B), PL38(B), PL39(B), PL43(B), PL44(B), PL45(B), LLD291/01 Rev 08, LLD291/02 Rev 06 and LLD291 03 Rev 07 received on 15/10/10 and PL41(B) and PL42(B) received on 18/10/10.

Reason: For the avoidance of doubt and in the interests of proper planning.

3. The main Keep building and car park hereby permitted shall not be open to visitors (excluding staff) except between the hours of 09.00 and 22.00, and there shall be no loading or unloading of vehicles on the site outside of the opening times.

Reason: To safeguard the amenities of the locality and avoid conflict with surrounding uses, to comply with policies SU10, QD27 and TR7 of the Brighton & Hove Local Plan.

4. Noise associated with plant and machinery incorporated within 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 a level 5dB below the existing LA90 background noise level. Rating Level and existing background noise levels to be determined as per the guidance provided in BS 4142:1997.

Reason: In the interests of pollution control, to comply with policy SU10 of the Brighton & Hove Local Plan.

5. The soft landscaping and ecological measures within the development which include provision of new native woodland tree planting, native hedgerow planting, native wildflower grassland and bird and bat boxes, shall be carried out in accordance with the submitted Lizard Landscape Design Landscaping and Ecology Strategy and Outline Plant Specification and Landscape and Ecological Scheme 10 Year Long-Term Maintenance Plan (October 2010) except with regard to the following:

- proposed planting on the north/north-western boundary of the site adjacent to Lewes Road
- proposed plant species for the green roof
- proposed hedgerow around north-east woodland copse adjacent to the balancing pond
- provision of a wildlife pond or other ecological measure to be agreed

A further soft landscaping/ecological scheme which shall include details of dense tree planting for this northern boundary, details of green roof planting incorporating nutrient poor chalk top soil, omission of the north-east hedgerow and details of a new wildlife pond or other ecological

measure within the site shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of development. The soft landscaping and ecological measures within the site shall be carried out as per the agreed details unless otherwise agreed in writing by the Local Planning Authority. **Reason:** In the interests of the visual amenity of the locality and as additional landscaping is required for the northern boundary to help screen and soften the development, and for biodiversity, to comply with policies QD15, QD16, QD17 and QD18 of the Brighton & Hove Local Plan and Supplementary Planning Document SPD11 Nature Conservation and Development.

6. All planting, seeding or turfing comprised in the approved scheme of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the building or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 7 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation. The foliage immediately adjacent to the proposed cycleway/footway within the site shall be maintained to a height of no more than 1 metre and the tree canopies in this location shall be maintained no lower than 2 metres. The landscaping and ecological measures on the site, including green roofs, shall be maintained in perpetuity.

Reason: To enhance the appearance of the development in the interest of the visual amenities of the area and for biodiversity and crime prevention, to comply with policies QD1, QD15, QD16, QD17, QD18 and QD7 of the Brighton & Hove Local Plan.

7. The felling of trees shall be carried out in accordance with the measures in Section 4 of the Ash Partnership Bat Roost Assessment Report July 2009 submitted as part of the Addendum to Ecology and Landscape Strategy on 29th November 2010 and the felling shall be in accordance with the requirements of the Habitats Regulations 2010.

Reason: In the interests of biodiversity to ensure potential bat roosts are properly managed, to comply with policy QD18 of the Brighton & Hove Local Plan.

8. The external lighting shall be installed in accordance with the approved details and thereby retained as such unless a variation is subsequently submitted to and approved in writing by the Local Planning Authority.

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.

9. All construction works in the vicinity of retained trees on the site shall be carried out in accordance with the mitigation measures contained in Section 8 of the Lizard Landscape Design Arboricultural Assessment Report October 2010 unless otherwise agreed in writing by the Local Planning Authority. Construction methods shall comply with BS 5837 (2005) Trees in Relation to Construction, NHBC Building Standards Chapter 4.2 – Building Near Trees, the AAIS Arboricultural Practice Note

No 1 Driveways Close to Trees and NJUG10 Guidelines or the Planning Installation and Maintenance of Utility Services in Proximity to Trees.
Reason: To ensure the trees within the site are adequately protected in the interests of visual amenity and biodiversity to comply with policies QD15, QD16, QD17 and QD18 of the Brighton & Hove Local Plan.

Pre-Commencement Conditions:

10. No development shall take place until a scheme for the protection and translocation of reptiles, including reptile exclusion fencing, has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to any works commencing on site.

Reason: To ensure reptiles are adequately protected in the interests of biodiversity, to comply with policies QD17 and QD18 of the Brighton & Hove Local Plan.

11. No development shall take place until the tree protective fencing scheme for protecting retained trees during construction has been implemented as contained within Section 8 of the Lizard Landscape Design Arboricultural Assessment Report October 2010, unless otherwise agreed in writing by the Local Planning Authority. The scheme shall ensure all measures are in accordance with BS 5837 (2005) Trees in Relation to Construction. The fencing shall be erected prior to the commencement of all works on site and retained in place throughout construction. The fencing shall be retained until the completion of the development and no vehicles, plant or materials shall be driven or placed within the areas enclosed by such fences.

Reason: To protect the trees which are to be retained on the site in the interest of the visual amenities of the area and for biodiversity to comply with policies QD1, QD15, QD16, QD17 and QD18 of the Brighton & Hove Local Plan

12. BH03.01 Samples of Materials Non-Cons Area (new buildings).

13. No development shall take place until large scale plans and further information regarding architectural details within the scheme including the frieze on the external elevations of the repository block, the louvres, the parapet detail and junctions where contrasting materials meet have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure a satisfactory appearance to the development and to comply with policy QD1 of the Brighton & Hove Local Plan.

14. No development shall take place until there has been submitted to and approved in writing by the Local Planning Authority a scheme for hard landscaping, which shall include all hard surfacing throughout the site and means of enclosure including fences, walls, barriers, bollards and gates. All hard landscaping and means of enclosure shall be completed before the development is occupied.

Reason: To enhance the appearance of the development in the interest of the visual amenities of the area and to comply with policies QD1 and QD15 of the Brighton & Hove Local Plan.

15. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, including a timetable for the investigation, which has been submitted by the applicant and approved in writing by the Local Planning Authority and the works shall be undertaken in accordance with the approved details.
Reason: To enable the recording of any items of historical or archaeological interest, as the development is likely to disturb remains of archaeological interest, in accordance with requirements within PPS 5 'Planning for the Historic Environment'; and Policy HE12 of the Brighton & Hove Local Plan.

16. No development shall take place until details have been submitted to and approved in writing by the Local Planning Authority to demonstrate measures which will be undertaken to protect public sewers and water mains. The approved measures shall be implemented.

Reason: To protect drainage and water supply apparatus, to comply with policies SU3 and SU5 of the Brighton & Hove Local Plan.

17. No development approved by this permission shall be commenced until details of the proposed means of foul and surface water sewerage disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water. The drainage works shall be completed in accordance with the details.

Reason: To prevent the increased risk of flooding and to prevent pollution of controlled waters by ensuring the provision of a satisfactory means of surface water disposal and to comply with policies SU3, SU4 and SU5 of the Brighton & Hove Local Plan.

18. No development shall take place until details of the proposed rainwater harvesting system have been submitted to and approved in writing by the Local Planning Authority. The details shall include a maintenance regime for the system. The approved details shall be implemented.

Reason: To protect the public water supply and avoid cross contamination to comply with policies SU3, SU4 and SU5 of the Brighton & Hove Local Plan.

19. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1. A site investigation scheme based on the Preliminary Contamination Risk Assessment Report (Ashdown SI Ltd, Reference LW/19114/ds, June 2008), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

2. The site investigation results and the detailed risk assessment (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

3. A verification plan providing details of the data that will be collected in

order to demonstrate that the works set out in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.
Reason: To ensure historical contamination does not present unacceptable risks to groundwater within a highly sensitive area and ensure development proceeds in accordance with PPS 23 and policies SU3, SU4 and SU5 of the Brighton & Hove Local Plan.

20. No development of the energy centre shall take place until details of the plant proposed within it, including the proposed boiler, exit gas velocity and chimney flue have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented.

Reason: To prevent pollution to comply with policy SU9 of the Brighton & Hove Local Plan.

21. No development shall take place until detailed drawings, including levels, sections and constructional details of the proposed road treatments, access ramps, surface water drainage, outfall disposal, and street lighting to be provided, have been submitted to and approved in writing by the Local Planning Authority. The access ramps leading to the bus stop in the north-west corner of the site shall be fully accessible for the disabled and include handrails and upstand kerbs.

Reason: In the interests of highway safety and for the benefit and convenience of the public at large and to comply with policies TR1, TR7, and TR8 of the Brighton & Hove Local Plan.

Pre-Occupation Conditions:

22. The development shall not be occupied until a scheme including the type and location of 10 bird nest boxes and 10 bat roost boxes has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented before the development is first brought into use and maintained in perpetuity.

Reason: In the interests of biodiversity, to comply with policies QD17 and QD18 of the Brighton & Hove Local Plan.

23. Prior to first occupation a Drainage Infrastructure Maintenance Plan shall be submitted to and approved, in writing, by the Local Planning Authority. The plan shall include the following elements:

- Owner Responsibilities
- On-site Staff Training
- Emergency Actions
- As built drawings of the drainage systems
- inspection and Maintenance regimes of Surface Water System
- Inspection and Maintenance regimes of Foul Water System.
- Maintenance Records Management details

Reason: To protect vulnerable groundwater resources to comply with policies SU3, SU4 and SU5 of the Brighton & Hove Local Plan.

24. Notwithstanding the car parking layout as shown on the submitted drawings, no development shall place until a revised car parking layout has

been submitted to and agreed in writing by the Local Planning Authority. The revised layout shall include provision for 5 additional disabled car parking spaces to give a total of 15 unless otherwise agreed in writing by the Local Planning Authority. The approved revised car, coach and motorcycle parking areas shall be laid out and implemented prior to first occupation of the building. The vehicular parking areas shall thereafter be made available for staff and users of The Keep and for no other use. No vehicular parking other than that as laid out and shown on the approved plans shall take place within the site.

Reason: To ensure the demand for travel created by the development is met, including for the disabled, and to ensure adequate parking provision is retained, and in the interests of highway safety, to comply with policies TR1, TR7, TR18 and TR19 of the Brighton & Hove Local Plan.

25. The development hereby permitted shall not be occupied until a Car Parking Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with the Highways Agency. The approved Car Parking Management Plan shall be implemented.

Reason: In the interests of highway safety to comply with policy TR7 of the Brighton & Hove Local Plan.

26. The development hereby permitted shall not be first occupied until evidence has been submitted to and approved in writing by the Local Planning Authority to demonstrate that the crime prevention measures outlined in the letter from Sussex Police dated 5th November 2010, including lighting to standards within BS5489, vehicle mitigation for out of hours, signage, peripheral physical security, an intruder alarm and secure design of the refuse and recycling store, have been implemented within the development. The crime prevention measures shall remain in perpetuity.

Reason: To reduce the opportunities for crime, to comply with policy QD7 of the Brighton & Hove Local Plan.

27. The development hereby permitted shall incorporate the sustainable measures contained in the Sustainability Planning Report including use of solar thermal and photovoltaic arrays, a biomass boiler and rainwater harvesting. The development shall not be occupied until a BREEAM Design Stage Certificate and a Building Research Establishment issued Post Construction Review Certificate confirming that the non-residential development built has achieved a BREEAM rating of 70% in energy and water sections of relevant BREEAM assessment within overall 'Excellent' has 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 SU2 of the Brighton & Hove Local Plan and Supplementary Planning Document SPD08 Sustainable Building Design.

28. Notwithstanding the details shown, the development hereby permitted shall not be first occupied until details of secure, covered cycle parking facilities for staff and visitors to the development hereby approved, for a minimum of 20 spaces, have been submitted to and approved in writing by the Local Planning Authority. These facilities shall be fully implemented

and made available for use prior to the occupation of the development 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 for crime prevention to comply with policies TR14 and QD7 of the Brighton & Hove Local Plan.

29. The development hereby approved shall not be occupied until the refuse and recycling storage facilities indicated on the approved plans have been fully implemented and made available for use. These facilities shall thereafter be retained for use at all times.

Reason: To ensure the provision of satisfactory facilities for the storage of refuse and recycling and in the interests of sustainability to comply with policies SU2, SU14 and QD27 of the Brighton & Hove Local Plan.

Informatives

1. This decision to grant Planning Permission has been taken:

- (i) having regard to the policies and proposals in the Brighton & Hove Local Plan set out below, including Supplementary Planning Guidance and Supplementary Planning Documents:

Brighton & Hove Local Plan:

TR1	Development and the demand for travel
TR2	Public transport accessibility and parking
TR4	Travel Plans
TR5	Sustainable transport corridors and bus priority routes
TR7	Safe development
TR8	Pedestrian routes
TR12	Helping the independent movement of children
TR14	Cycle access and parking
TR15	Cycle network
TR18	Parking for people with a mobility related disability
TR19	Parking standards
SU2	Efficiency of development in the use of energy, water and materials
SU3	Water resources and their quality
SU4	Surface water run-off and flood risk
SU5	Surface water and foul sewage disposal infrastructure
SU9	Pollution and nuisance control
SU10	Noise nuisance
SU11	Polluted land and buildings
SU13	Minimisation and re-use of construction industry waste
SU14	Waste management
SU15	Infrastructure
QD1	Design – quality of development and design statements
QD2	Design – key principles for neighbourhoods
QD3	Design – efficient and effective use of sites
QD4	Design – strategic impact
QD5	Design – street frontages

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QD6	Public art
QD7	Crime prevention through environmental design
QD15	Landscape design
QD16	Trees and hedgerows
QD17	Protection and integration of nature conservation features
QD18	Species protection
QD19	Greenways
QD25	External lighting
QD27	Protection of Amenity
QD28	Planning Obligations
EM2	Sites identified for high-tech and office uses
EM3	Retaining the best sites for industry
NC3	Local Nature reserves
NC5	Urban fringe
NC7	Sussex Downs Area of Outstanding Natural Beauty
NC8	Setting of the Sussex Downs Area of Outstanding Natural Beauty
HE6	Development within or affecting the setting of conservation areas
HE11	Historic parks and gardens
HE12	Scheduled ancient monuments and other important archaeological sites

Supplementary Planning Guidance:

SPGBH4 Parking Standards

Supplementary Planning Documents:

SPD03 Construction & Demolition Waste
SPD06 Trees & Development Sites
SPD08 Sustainable Building Design
SPD11 Nature Conservation & Development; and

(ii) for the following reasons:

There is a demonstrable need for improved archive and record storage facilities. The proposal would provide an enhanced public facility and promote greater access and interest and is a culturally important facility. The proposal would generate employment. The proposal has demonstrated that there is potential on the remainder of Woollards Field to satisfactorily accommodate a significant B1 development. The design is satisfactory and will have an acceptable landscape impact including upon designated heritage and landscape assets. The scheme will be highly sustainable and will meet BREEAM excellent. The demand for travel will be satisfactorily met. The proposal will conserve and enhance biodiversity. Important trees will be retained and adequately protected. Flood risk would not be increased and adequate drainage will be provided. Archaeology assets will not be compromised by the proposal. The proposal will not compromise air quality or cause light or noise pollution. Crime prevention measures will be incorporated. The

development is subject to conditions and Section 106 obligations that will ensure the proposal meets Local Plan policy and ensure any potential adverse effects are satisfactorily mitigated against.

2. IN05.06A Informative BREEAM.
3. IN05.07A Informative - Site Waste Management Plans.
4. Any hedge planted adjacent to Network Rail's boundary fencing should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. A list of tree species that are permitted is available on request from Mike Smith, Network Rail, 1 Eversholt Street, London NW1 2DN.
5. The applicant/developer is required to enter into a formal agreement with Southern Water to provide the necessary sewerage infrastructure required to service the development.
6. The applicant/developer is advised to have due regard to the advice contained within the enclosed letter and plan from Southern Gas Networks dated 3rd November 2010 to ensure the development does not cause undue damage to gas plant.

2 THE SITE

Woollards Field is located south-west of the Southern Water offices on the A270 at Falmer. It is a rectangular grassed field between the A270 and railway line. It was last used as overflow playing fields for schools and was declared surplus to requirements in 1990. The site is owned by East Sussex County Council (ESCC).

The site is relatively flat and contains a number of mature trees within it, some of which are covered by a Tree Preservation Order, notably a line of mature hornbeams adjacent to the railway embankment.

The site is within the defined built up area and is allocated for hi-tech and office uses under policy EM2 of the Local Plan.

3 RELEVANT HISTORY

Planning History:

The above permissions have been renewed to 'keep them alive' every few years since. The last renewal applications submitted in 2005 (refs **BH2005/01879/FP** & **BH2005/01934/FP**) are currently being held in abeyance and have not been determined. In 2004 an application for 10,000sqm B1 office development was submitted (ref **BH2004/03066**) and this also remains in abeyance. The main reasons why work on these most recent applications has been 'frozen' is due to potential conflicts with the Falmer Community Stadium development (primarily due to access arrangements) and due to the

current proposals for The Keep.

97/0003/RM Submission of Reserved Matters (including siting, design and external appearance). Approved 14/7/97.

1291/CC Outline application for 5,000sqm business development with 167 car spaces and a landscaped environmental strip/informal play area. Approved 28/4/93

Background to The Keep project:

The existing East Sussex County Council Records Office is based at The Maltings in Lewes and was set up in 1949. ESCC is responsible for the archives and records for Brighton & Hove. It is currently primarily. In 2003 and 2006 inspections by The National Archive, the regulatory body for historic archives and public records, were highly critical of the current accommodation and the licence to hold public records was granted only on the condition that there is progress towards a new record office on a single site within 5 years. There is a legal obligation for public access to records and currently the arrangements for care and access to the collections do not meet the standards of The National Archives.

In 2006 this led to development of 'The Keep' project to house the archives and records of ESCC, BHCC and the University of Sussex in one purpose built modern facility. A Joint Project Board was set up to oversee the project attended by council officers and councillors. Following a thorough county-wide site search, Woollards Field was selected as it was felt to best meet the criteria required for such facilities.

Since autumn last year a series of pre-application discussions have taken place with council officers and consultees and the scheme was presented to Planning Committee Members in July this year. The pre-application process has influenced the final scheme.

4 THE APPLICATION

Planning permission is sought for a 1-3 storey building of contemporary design to be used as a historic records and archive centre for East Sussex, Brighton & Hove and the University of Sussex.

The Keep will be a public facility and include the following:

- lecture and educational facilities
- a reading room
- conservation laboratories
- archivist study areas
- offices
- cleaning and repair facilities for archives
- a repository block
- a refreshment area (café and area for people to bring own refreshment)

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- a biomass energy centre
- car, coach and cycle parking (total 59 car parking spaces)
- waste and recycling storage
- landscaping
- new public open space
- new access road
- a new footpath and cycleway through and leading to the site

The Keep would house historic records and archives from Brighton & Hove City Council, East Sussex County Council and the University of Sussex. The collections would be of local, regional, national and international interest including the internationally renowned Mass Observation Archive. The Keep would also include the library and headquarters of the Sussex Family History group.

The type of records to be held include written records, maps, plans, photographs, films, prints, drawings, oral histories and digital and electronic records.

As well as the general public, school, colleges, universities, volunteers, community groups and local organisations would access the collections. It is anticipated that the proposal will generate approximately 16,000 visitors after year 1 and approx 19,500 visitors after year 5. It is expected that the scheme will employ 35 people (some of which will be new rather than transferred jobs).

The development incorporates sustainable building measures including solar thermal and photovoltaic arrays, rainwater harvesting and green roofs. The application includes a Pre-BREEAM Assessment that demonstrates the development is capable of achieving an 'excellent' rating. The proposal includes capacity for the next 20 years and includes the potential for future expansion after that if required.

The tallest element (the repository block) will be 14 metres high and the equivalent of approx. 4-storeys. The building is in effect split into two parts – the 'people block' and the 'repository' block. The total floor area would be 5453 sqm. The building is proposed to be partly rendered and partly brick. An 'information frieze' wrapping around the repository block is proposed comprised of cast panels of images sourced from the archives. An art/media wall is proposed to the front elevation.

The Keep is located on part of Woollards Field, towards the north-east of it. The application includes an illustrative masterplan showing potential development land for B1 office use to the south-west – but this does not form part of the application.

The application contains the following supporting documents:

- Planning Statement

- Design and Access Statement
- Landscape Character and Visual Impact Assessment
- Photomontage Images and Locations
- Landscape and Ecological Strategy and Outline Plant Specification
- Landscape and Ecological Scheme 10 Year Long- Term Management Plan
- Transport Assessment
- Flood Risk Assessment
- Noise Report
- Archaeological Desk Based Assessment
- Arboricultural Assessment Report
- SMART Waste Plan
- Sustainability Pre-Planning Report
- Energy Centre Pre-Planning Report
- External Lighting Pre-Planning Technical Report
- Land Contamination Risk Assessment Report
- Construction Environment and Management Plan
- Statement of Community Involvement

5 **CONSULTATIONS**

Internal

Neighbours: 1 letter of support from **139 Thordean Road** on grounds that the Keep will be an asset to the area and the city as well as the two universities and school/academies in the city.

Brighton & Hove Albion Football Club: No response received.

University of Brighton: No response received.

University of Sussex: No response received.

Southern Water (as neighbour): No response received.

Residents Groups:

Resident Association of Moulsecoomb: No response received.

North Moulsecoomb Tenants & Residents Association: No response received.

Statutory Consultees and Amenity Groups:

Brighton & Hove Bus and Coach Company: No response received.

Brighton & Hove Economic Partnership: No response received.

Brighton Urban Wildlife Group: No response received.

Bus Users UK: No response received.

Conservation Advisory Group: The development would not have significant impact on the Stanmer Conservation Area or the wider historic landscape.

Cycling England: No response received.

East Sussex County Archaeologist: The development has been subject to both archaeological desk based assessment and evaluation excavation. These have shown that the site has potential archaeological significance and therefore a condition to secure a programme of archaeological works, including a written scheme of investigation, is recommended to enable any deposits or features to be adequately recorded

East Sussex County Council (Development Control – Planning & Transport): No response received.

East Sussex Fire and Rescue Service: The application appears to satisfy necessary building and fire regulations. The choice not to use an automatic fire suppression system carries risk as reliance on passive fire safety measures could mean a significant threat to these valuable items.

EDF Energy: No objection.

English Heritage: Do not wish to offer any comments and state application should be determined in accordance with national and local policy advice, and on the basis of council's specialist advice.

Environment Agency: The site lies within a sensitive area with regard to groundwater and is also a Source Protection Zone 1. Planning permission should only be granted subject to conditions relating to site investigation and a drainage infrastructure maintenance plan. Without these, the proposed development would pose an unacceptable risk to the environment. Provided only roof water is discharged to ground within the SPZ1 area, we have no objections to the proposed drainage strategy. The preliminary Contamination Risk Assessment Report has been carried out in line with relevant guidance. The recommendations for further investigations at the site to determine any required appropriate remediation works should be carried out and relevant proposal agreed with the LPA before any site clean up works are commenced.

Falmer High School: No response received.

Falmer Parish Council: No response received.

Friends of Stanmer Park: No response received.

Garden History Society: No response received.

Highways Agency: Initial concern expressed regarding site access, parking, trip generation and distribution, background traffic flows, impact of committed development, traffic flow analysis, slip road capacity and travel plan. Following submission of further supporting information to the Transport Assessment and discussions held with the applicant, many of the issues raised have been resolved and conditions are requested to secure a Construction Environmental Management Plan, a Car Parking Management Plan, a loop to control queue lengths and a Travel Plan - in the interests of highway safety and to minimise vehicle trips on the strategic road network.

Lewes District Council (Development Control): No objection.

The National Archives: We have been consulted and informed throughout the choice of site and development of plans for The Keep. We are also aware of the efforts to make this building one of the most environmentally friendly archive buildings in the UK. We have no objection to the plans and indeed warmly welcome them as having potential to offer storage and access in line with national standards for the preservation of the unique archival material.

National Council on Archives: No response received.

Natural England: As the site is adjacent to the South Downs National Park the provisions of government policy relating to NP's applies (PPS7, circulars 12/96 and 125/77). The opinion of the NP Authority should be sought. Council's need to refer to guidance contained within our standing advice to assess the impacts associated with the development upon protected species. This application has many opportunities to incorporate features in the design that are beneficial for wildlife e.g. roosting for bats, bird nest boxes, native planting. If the application is minded to grant would recommend measures to enhance the biodiversity of the site are secured from the applicant. This accords with PPS9 and we would draw you attention to Section 40 of NERC Act 2006 which states every public authority must conserve biodiversity. Any landscaping should be of native species of local provenance and existing wildlife habitats and corridors should be retained.

Network Rail: An informative is recommended to ensure the proposed landscaping (including species of trees) close to the railway border does not damage our fencing or provide a means of scaling it or prevent maintenance.

Older Peoples Council: No response received.

SEEDA: No response received.

South Downs National Park Authority (interim): It is noted that the Landscape & Ecology Strategy was written prior to the details of the development being drawn up. It is also noted that a Landscape & Ecology Management Plan has been drawn up. Providing your ecological advisors are satisfied with the details submitted, that there will be no significant harm to

ecology, and that adherence to the Landscape & Ecology Management Plan is ensured through a condition, no objection would be raised to the proposals.

South Downs Society: It is understood that the site has previously had outline permission for 5,000sqm of B1 office development and there is a pending application for 10,000sqm office. Our primary issue is the impact that any development may have on surrounding landscape including the Stanmer Conservation Area and National Park. We welcome provision of a detailed Landscape and Visual Impact Assessment Report and note the VIA concluded there would be minimal impact on setting of National Park or Stanmer Park. Much of this appears to be supported by proposals to retain vegetation and new planting to soften and filter views. The Council needs to satisfy itself as to the extent of the landscaping and the influence over time. We welcome proposals to include two new woodland blocks to soften and filter views which we agree should help in maintaining the native, woodland character of the National park and surrounding area around the development site.

Although the impact of the development may on balance have only a slight impact on the South Downs and the National park, it would consist nonetheless of a fairly considerable new building being introduced to the landscape which, at 3 storeys in height, would be visible from the South Downs. Given that the 10,000sqm application could result in 1x4 storey building and 2x3 storey building, this application for The Keep would on balance seem to be preferable option for the land. Notwithstanding this we would ask that the council satisfy itself that the external design and appearance of the main building, which appears rather uninspiring and bland, would indeed respond sympathetically to the surrounding area including the National Park. Also we believe the current layout could be challenged as to whether the required capacity could be met by a building or buildings of say, no more than 2 storeys high.

Southern Gas Networks: A plan showing pipes owned by SGN is included for information. You will note the presence of a gas main in proximity to the site and advice regarding safe excavation is given in order to prevent damage to SGN plant.

Southern Water: Conditions are recommended to protect drainage and water supply apparatus. There are no public surface sewers in the area to serve the development. The Flood Risk Assessment indicates that the hardstanding areas including car park and main access road will discharge into foul sewer running through the site but regrettably there is inadequate capacity. The proposal development would increase flows to the public sewerage system, and existing properties and land may be subject to greater risk of flooding as a result. Additional off-site sewers, or improvements to existing, will be required and an informative is recommended to ensure the applicant enters into a formal agreement with us to provide the necessary sewerage infrastructure required to service this development. The Council's Building

Control officers should be asked to comment on the adequacy of the soakaways. A condition requiring details of foul and surface water drainage is recommended prior to commencement of development. The applicant has proposed a rainwater harvesting system that will be used for WC flushing and landscape watering – they must be installed to high standards to ensure protection of public water supply. And a condition requiring details and a maintenance regime is recommended.

Stanmer Preservation Society: No response received.

Sussex Family History Group: Fully support the proposal. The facility at The Maltings in Lewes has for many years been unfit for purpose. There is a statutory requirement for both councils to properly house their records and the proposed new building will be fully compliant and meet highest standards. In addition The Keep will provide accommodation for the Sussex Family History Group in which to house and allow access to its records, many of which are complimentary to the holdings of the two councils. The proposed site is exceptional in that is central to the catchment area served by 2 councils, is in an area given to non residential use and it will have excellent access by both road and rail.

Sussex Gardens Trust: No response received.

Sussex Past: No response received.

Sussex Police (Community Safety): Crime Prevention is a material planning consideration. The level of crime in this location is average compared to the rest of Sussex and we do not have concerns about this proposal. As a result of pre-application discussion it is pleasing to note that aspects of crime prevention have been incorporated into the Design and Access Statement. The decision to opt for landscaping to define the boundaries of the site as opposed to security fencing combined with the design and layout has created active frontage on 3 sides of the building, providing good open surveillance. Implementing suitable lighting, and CCTV will provide the capable guardian needed during out of hours. The footpath/cycleway through to Ashurst Road will need clear lines of observation with ground foliage no higher than 1 metre and tree canopies no lower than 2 metres. It is to be lit to the relevant standards as defined in BS 5489. Vehicle mitigation out of hours will be considered in the form of bollards or barrier positioned across the vehicle access at the northern boundary of the development. Adequate signage can be provided throughout. All staff entry will be controlled by an access control system. Peripheral physical security can be achieved. A monitored intruder alarm is recommended. The external recycling store should be secured.

Sussex Wildlife Trust: No response received.

Sustrans: No response received.

Internal

Access Officer: Ideally more detail about the ramps is needed – they need upstand kerbs and handrails. Also they seems to discharge straight into the car park and go through bike sheds. The footpath alongside the energy building has potential for doors open across footpath which is not ideal. There appears to be suitable spaces for toilets but no details are shown. There are also the required refuges on the escape stairs.

Arboriculturist: There are many trees on this site including a line of 50+ mature hornbeams. A Tree Preservation Order covers the majority of the site, dating from 1974, meaning that any tree present at that time would be covered. The proposed development allows for the retention of over 70 trees and the loss of 29 in total, however, some of those to be lost are already dead, in dangerous condition or may not have been present in 1974 and thus not covered by the TPO. We are pleased to note that that the majority of the worthy trees on site are to be retained, and this is to be commended for a scheme of this magnitude. The Arboricultural Assessments and Landscape Strategies are extremely comprehensive, and include a 10 year long term management plan for the proposed new areas of planting. The landscaping proposed is exhaustive and includes a new native species woodland block next to the balancing pond, gapping up the existing line of hornbeams, new planting area next to existing play area, filling in of gaps in northern boundary and new trees in the car park.

We have been involved in all pre-application stages and we are pleased to note all documents involving the trees and landscaping are comprehensive and all-encompassing. We are in full agreement with them, and subject to conditions, we would have no objection to the current proposal. Conditions are recommended to ensure protection of trees during construction and shall include fencing and hand excavation where necessary.

City Clean: The recycling and waste will be serviced commercially and not by CityClean. The layout and area on the plan appears satisfactory.

City Neighbourhood Coordinator: Comments received from residents are quite enthusiastic, some examples as follows: “It will make use of that land, it is just hoped when it’s up and running its accessible for everyone and that there will be jobs for local people; “I am very happy with the plans. It will be a very interesting building, something for everyone to see in there.”; “Good idea, it will be interesting for people”; “They listened to us when they were asked questions about the gates on the car park”; “I think its good and don’t know anyone who’s not happy with it; “It’s a good idea, so long as it benefits the local community”.

City Parks: We agree to taking over the new public open space after a 5 year maintenance period, with the proviso that we are able to agree original layout and planting plans and subject to the area being maintained to our satisfaction for those 5 years and payment of the maintenance fund (for 25

years) of £13,781 indexed, and to other agreements already outlined by planning requirements.

Children & Young People's Trust: The proposal will be a welcome addition to the city and will provide research opportunities for schools/pupils that do not exist at the moment and therefore the proposal is to be welcomed. It is not envisaged that allowing pedestrian and cycle access through the railway tunnel linking to Falmer Station will cause an issue for Falmer Academy as the new development there provides a new fence and main gate so the site will be secure.

Culture & Enterprise (Libraries): Fully supports the application as the value of preserving and archive materials and making them accessible to the public is understood.

The council has a statutory duty to both care for and make accessible public records and the current storage and preservation facilities for the city's archive material are completely inadequate and better solution is needed as a matter of urgency. The licence granted by the National Archives to ESCC was only renewed on condition that an acceptable long term solution was found. Identifying appropriate facilities that meet the requirements of the National Archives is difficult, and a number of locations were looked and rejected as they did not meet the standards needed for the long term housing, preservation and accessibility required.

A purpose built archive centre within the boundaries of the city that is served by good transport links is very much to be welcomed, as it means our own residents will have particularly good access. If the Keep project does not go ahead, the risks to the public records and historic archive material belonging to Brighton & Hove will significantly increase, as the current storage facilities, managed by East Sussex County Council are unsuitable. It would not make sense to withdraw from the joint arrangements with our partners, ESCC, as our ability to provide the right level of care and access to these resources on our own would be difficult and probably more expensive. It would also have a detrimental effect on service users. Our own experience in Libraries Services is that there is a significant and growing interest in local history materials and archives, and the development of the Keep will bring together a range of these resources currently kept in disparate locations, so that local people will have greatly improved access, with expert support and knowledge available on site. The Keep also provides the opportunity for the council to preserve and make accessible other collections in the correct environmental conditions, and to add to those collections in the medium term. There is also a golden opportunity to develop new education and audience development programmes, focussed on the collections and engaging the public's growing interest in local and family history.

Culture & Enterprise (Museums): support the application for following reasons:

- The Public Records Act 1957 establishes legal framework by which the public have a statutory right to access public records. The management of these records needs to conform to TNA standards, which include standards for access, storage and preservation, acquisition and staffing. Same standards apply to both county and unitary records.
- Current storage and preservation facilities for city council (and county) are historically and legally important and are completely inadequate – a long term solution is needed as a matter of urgency. Failure to proceed with the Keep will contribute to rapid deterioration or loss of BHCC records.
- A number of sites and alternatives were considered however none met the requirements of the National Archives. The selection of a site within the city boundaries served by good transport links should be welcomed
- The Keep will provide right environment for long term preservation for archives and means there is opportunity to relocate sensitive material currently housed in unsuitable storage in the museum service to the Keep. It would include adequate space for growth (20 years).
- The National Archives could withdraw the licence and seek to place material elsewhere, most likely outside the city. Removal of material would be embarrassing for the partners, impact negatively on reputation of city's commitment to culture and heritage and have a detrimental effect on service users.
- The Keep will also ensure long term preservation of other 2d material currently held in inadequate storage within RP&M sites
- The Keep will provide a focus for new public engagement and learning programmes, partnership working would bring better value to the respective organisations involved and ensure that material will be used to maximise its public value. The Keep would provide the city with a vibrant community resource and a centre for excellence. It will be a leading model in the engagement of new audiences with historical resources and pioneering new ways of working with collections, through the provision of new models for learning and participation.
- The new centre will represent the next generation of archive buildings in the UK in line with Archive Policy and is on target to be the most sustainable archive building of this type in the country.

Design & Conservation: Recommend approval with conditions. The project will provide a public facility of considerable cultural importance, the principle of which is supported. The development will significantly change the landscape character of the site, but a change that accords in principle with the Development Plan. The location is judged appropriate in terms of use, general form and its public accessibility along the A270 sustainable transport corridor. The design is a reasonable response to the Council's planning proposal for the site, and to specific legal and technical constraints applicable to the site and its use.

The South East Regional Design Panel

The SERDP were consulted at the pre-application stage and raised some reservations regarding the coherence of the scheme and ‘the arrival experience’ and its appropriateness within the landscape context. Overall the Panel did not consider that the building expresses its civic significance as well as it might nor provides the visual excitement such a building deserves. Subsequent amendments include a ‘frieze’ around the repository block and added planting within the car park. There are no other significant changes in response to the SERDP. The applicant argues the design is a logical response to the function of the building. It has been consciously split between 2 discrete parts, namely public and storage and has been designed having regard to the very particular requirements of the use, the constraints of the site, and the available budget.

Design and materials

The building is of simple construction and its appearance is satisfactory if uninspiring. It has no strong visual identity and is reliant on a possible art/media wall to enliven the entrance/approach. Nevertheless the design concept is clear – that is to produce a high quality resource centre that meets the necessary national standards and to budget. Whilst disappointing that the project could not deliver a building of higher architectural quality or greater civic significance, it clearly meets the brief, provides adequate access and safeguards land for future expansion and other commercial uses.

The proposed brick (Warnham Yellow Multi stock) will site quietly in the landscape and compliment the other materials proposed. Equally a brown/red brick could be considered. The colour of the metal roofs and louvres should reflect the natural colours of the surrounding landscape, since these elements will be primarily viewed from higher ground against a backdrop of woodland and red brick/tiled housing rather than sky. A grey or silver finish would not be appropriate.

Wider landscape context

The documents, including the visual impact assessment, are comprehensive and generally sound. They help demonstrate that the building will not have a significant impact on any designated heritage or landscape asset, including the Stanmer Park Conservation Area or the Stanmer Park registered historic park or garden, and the South Downs National Park, so long as (i) adequate planting is secured to enhance the existing landscape and to reinforce the existing boundary hedge lines and (ii) the external cladding materials are carefully chosen. The upper parts of the building will however be clearly visible from the adjacent A270, Lewes Road, and will appear bulky in appearance. A reduction in height would be the preferred response, alternatively greater tree planting on site is recommended.

When visible, the building will be viewed as a stand alone structure on the valley floor in a wooded landscape context. From elevated positions from within the National Park it will be seen in the context of other assorted developments along the Lewes Road valley, rather than in open countryside.

From longer viewpoints the contained landscape setting can absorb a ‘quiet’ understated building. There are only limited views of the site, and subject to careful choice of external cladding materials (see above), its visual impact will be slight. It will have little if any impact on the landscape setting of the Stanmer Park Conservation Area or the registered historic park.

Immediate landscape setting.

The height of the building and its footprint, has been driven at least in part by a need to safeguard part of the field for future B1 commercial development. The restrictions that this has placed on the development has resulted in a suburban ‘business park’ feel, and only passing reference to its rural setting.

From the A270 and the Moulsecoomb housing area the building will be seen through and over the trees along the site boundary, and in the context of the various woodland tree belts. It will be hidden from many locations, yet its unrelieved bulk and large ‘industrial’ scale will still be apparent and lack appeal, particularly from the elevated A270. Whilst the proposed frieze around the repository will provide some visual interest and give a visual clue to the building’s purpose, additional mixed tree screening is recommended to create a denser tree belt. Simply ‘infilling’ existing gaps will not provide the desired foil or counterpoint.

A landscape strategy will need to be agreed to ensure successful renewal, replacement and protection of existing and proposed woodland areas.

Conclusion

Subject to conditions to carefully control architectural detail, public art, materials and landscaping, it is considered that the scheme will satisfactorily meet the design and historic environment policies of the Local Plan.

Ecologist: It is highly regrettable that the trees within the woodland copse which have bat roosting potential are not to be retained (due to location of the development). However, given that a bat roost has never been found in any of the trees, despite specific searches at the right time of year, it is not considered reasonable to require their protection. In order to ensure the requirements of the Habitats Regulations 2010 are followed, the recommendations regarding tree felling described in section 4.6-4.9 (of the Bat Report) should be conditioned, as should the types and locations of the proposed bat roosting boxes. The interior of the field has been longer tussocky grass and is suitable for reptiles. Whilst it is a sub-optimal habitat for reptiles, they should be protected during construction via a strategy agreed by condition.

The proposed hedges around the new woodland proposals will not protect the new tree planting as intended because they will be too small to offer any protective affect until the trees are grown to sufficient size to no longer require protection, by which point the hedgerow will be shaded out by the trees. The hedge would not have significant ecological value and should be replaced

with other features (such as a wildlife pond) in order for the scheme to ‘earn’ the necessary nature points as per SPD11 if the scheme is to represent an enhancement. The composition of the proposed green roof should be amended to ensure it is of nutrient poor chalk subsoil and this could be sourced from the site.

Economic Development: Fully support the proposal. As this is an allocated employment site (policy EM2) the application is a departure from policy. However, the proposal will provide a much needed facility for the city and county on a site that has not come forward for development under policy EM2. The site has previous permissions that have not been implemented. There is provision made on the remainder of the site that is not included within the application to develop up to 5,640 sqm of B1 office space and access to this part of the site is made available with the current application and is therefore supported by the Economic Development Team. The proposal will provide a small element of employment generation – stated as 35 jobs (and a number will be new jobs as well as transfers). These are considerably lower than could be expected from a B1 development of similar size however are still welcomed as the remainder of the site (if developed) will make a significant contribution to increased employment levels in the city. The applicant is committed to working with the Local Employment Scheme ensuring a proportion of construction jobs created will be provided to Brighton & Hove residents. – this needs to be secured prior to commencement through the Section 106 Agreement so that we may detail how local employment will be sourced and used during the development stages. A percentage of 20% local employment is recommended.

Environmental Health: The development uses suitable glazing and construction methods to achieve protection from road and rail traffic noise. All plant should be able to achieve the council’s noise standard of 5dB(A) below background and a condition is recommended to ensure this. The external lighting will be switched off between 23.00hrs and 07.00hrs. It is considered best practice for a condition to be imposed to satisfactorily deal with any unexpected contamination. The CEMP should include: a requirement to submit a section 61 application for working hours, measures for noise control, a review process, monitoring for noise and dust and a process to manage noise complaints. The information submitted with regard to the energy centre is reasonable. Emissions from the wood powered boiler are unlikely to impact on adjacent buildings. It is the developers intention to install a biomass unit from the Defra exemption list and the location of the flue will be in compliance with the Clean Air Act. Further details of the flue, boiler and exit gas velocity will be required.

Planning Policy: It has been demonstrated that there is a requirement for a new, single public records centre to properly hold the ESCC and B&HCC public records as well as archives/collections from the University of Sussex. After a site selection process using criteria agreed by this City Council (Capital Projects Team) the applicants consider that this is the best practical

location for the proposed public records office. This scheme offers tangible public and community benefits, including the proper and safe storage of public historical records, a visitor's centre, the provision of educational facilities and school curriculum activities in its role as historical resource centre, a multifunction room to be made available for community hire, and just over half a hectare of new, laid out informal public open space adjacent to the existing equipped children's play area. The sustainability measures and adherence to BREEM Excellence standards are welcomed.

When considering urban open space and the application of policy QD20, a pragmatic and robust approach is to be taken to balance the competing claims of different land uses. The principle of developing this open space site in compliance with policy EM2 (the provision of high-tech and office uses) was considered during the Local Plan process. The Brighton & Hove Local Plan recognised the importance of urban open space (QD20), and also the requirement for high tech and office land use, and allocated this site for development compliant with EM2. Thus, in relation to this site development proposals that meet EM2 are acceptable in principle. Policy QD20 needs to be considered alongside policy EM2 here and does not override the respective employment allocation.

Since the adoption of the Brighton & Hove Local Plan in 2005 two relevant studies have been published which include the site – the Open Space, Sport and Recreation Study – as a quantitative study it is considered PPG17 compliant, and an Employment Land Study was published in 2006 with an update in 2009. These studies are considered to be material considerations and uphold the relevance of the aims and objectives of policies EM2 and QD20.

Therefore, in taking a pragmatic and robust approach to development at this location, how the scheme proposes to incorporate the aims and objectives of both policies EM2 and QD20 must be considered. To seek to demonstrate that there is capacity for the site to deliver both The Keep and a useful quantum of high tech and office use in line with policy EM2, an illustrative Masterplan has been prepared. From the planning history it can be seen that there has been an extant B1 permission on this site for a number of years which has never come forward for development.

With regard to policy QD20 and Urban Open Space, there will be provision made for the transfer to Brighton & Hove Council of 0.525 hectares of currently private open space (just outside the EM2 allocation boundary) immediately adjacent to the existing play area to the south, landscaped and laid out, with an appropriate 25 year financial maintenance agreement. Furthermore, the proposals include an on-site public amenity area thus improving and securing part of the remaining surrounding open space for public use, new tree planting, green roofs, ecology mitigation measures and new on site public footpath and cycleway. The existing situation is that none of the site has been available for public use.

The University of Sussex is a partner to The Keep project, and intends to make use of this site through the relocation of some of their existing archives and collections from the University Library to The Keep for public use. The University will also support and enhance the offer of the academic and educational facilities. Emerging policy DA3 – ‘Lewes Road Area’ within the submission version of the emerging Core Strategy supports proposals which further develop and enhance the role of Lewes Road as the city’s academic corridor by supporting proposals which improve secondary, further and higher education provision in the Lewes Road area. Woollards Field lies within the DA3 Lewes Road Area. Through the University’s involvement, and the provision of educational facilities and school curriculum activities that form part of the proposal, The Keep complies with and supports the Academic corridor concept and aspirations of emerging Core Strategy policy DA3.

Bearing in mind all the specific circumstances –including the community and wider public benefit of a unified, accessible public records and historical resource centre with academic and educational facilities and rooms for community use, an area of new informal public open space adjoining the existing play area with a 25 year maintenance sum, one further on site public amenity area, ecology and sustainability measures, the capacity to still deliver a useful quantum of high tech and office use – it is considered that in this particular case the aims and objectives of policies QD20 and EM2 have been acceptably absorbed into the Masterplan, that the loss of part of this EM2 allocation and open space can be pragmatically justified, and that it is acceptable for The Keep Records Office and Historical Resource Centre to be sited here as part of the overall comprehensive scheme.

Sustainability: All standards recommended in SPD08 have been met except the zero carbon expected for Greenfield sites. In many other aspects the proposals meet and in cases exceed standards in SU2 and SPD08. The energy strategy includes proposals for an energy centre containing biomass boiler fuelled by locally sourced woodchip, and a substantial photovoltaic and solar thermal array. A rainwater harvesting system is proposed as part of the approach to water management which exceeds recommended water standards through SD08.

The proposals commit to meeting BREEAM ‘excellent’ and plan to exceed 70% in water and energy sections. This guarantees a development that has high levels of water and energy efficiency. The development also proposes considerable use of renewable technologies: with heat for the buildings provided by biomass boiler fuelled by local woodchip; plus a significant solar array of photovoltaic and solar thermal panels totalling 368 square meters.

As a Greenfield site it is recommended through SPD08 that development be zero carbon. This has not been achieved by The Keep, which is predicted to emit an estimated 45tonnes of CO2 annually. There are technical reasons that make SPD08 energy standards for zero carbon development on

Greenfield sites particularly hard to achieve and these are explained in the submitted *Sustainability Planning Report* (Atkins). These include the requirement for internal environments for the archived material that demand through British Standards: specific temperature and humidity controls; protection from sunlight; and protection from pollution (infiltrating from nearby road). This restricts the potential for passive design determines building whose internal environments must be tightly controlled. In pre-application discussions the possibility of compensating for CO2 emissions was discussed. This explored implementing the methodology proposed in SPD08 of providing a financial contribution to reduce emissions elsewhere in the city. However, financial constraints meant this approach was not pursued. Whilst this is disappointing the proposals still represent a highly sustainable development which meets SPD08 and SU2 policies in other respects, and has addressed well the challenge delivering low carbon design in a building with challenging requirements for internal environments.

Water strategy includes water efficient design and incorporates a rainwater harvesting system which will provide water for WCs and (grass) roof irrigation.

Mitigation of urban heat island effect has been addressed by significant planting through out the site, and a grass roof on part of the main building; a composting area will offer provision for landscaping waste but disappointingly not food waste from the development; information about use of materials does not indicate a particularly sustainable approach. Use of daylight is welcomed (roof lights in Search area).

Sustainable Transport:

Traffic Impact

The applicants have demonstrated using the TRICS database that the expected traffic impact of the development is smaller than that allowed for in the design of the SEEDA highway works associated with the stadium. Initial concerns expressed by the Highways Agency regarding potential impact on the A27 junction have been resolved by discussion and further work building in the TA. The HA require a condition to ensure The Keep car park is not used for parking other than by users of The Keep in order that provision for The Keep is guaranteed and to ensure capacity at the A27/A270 junction is not prejudiced.

Officers have sought formal adoption of the access road for reasons of improved permeability but the applicants do not wish to lose control over the roads operation, and there is no local plan policy to insist upon adoption. A condition requiring detailed drawings of the proposed road treatments, drainage and street lighting is recommended prior to commencement of development. This will ensure it is compatible with adjacent highways. The new footway and cycleway will be a public right of way.

A Construction Environmental Management Plan is required prior to commencement and should specify the site access routes, delivery times and

construction logistics.

Parking

Provision of 59 spaces is well within the SPG maximum of 150. There is little prospect of displaced parking given the location on the edge of the built up area. Whilst this is a sui generis use, comparable uses in SPG4 indicate that a minimum of approximately 19 disabled spaces should be provided. 10 are proposed but the applicant has not established that their proposed relaxation of the standards would be appropriate - therefore a condition is recommended to ensure the layout is altered to accommodate 15 in total. This could be monitored as part of the annual travel plan review. The cycle parking proposed is acceptable, although a condition regarding the final design is recommended as there are aspects which are of concern.

Sustainable Modes/Contributions

The existing bus stops are within the 400m recommended maximum walking distance of the site and better sites are not practically available. Improvements such as real-time information and raised kerbs are possible. An acceptable programme of S106 highways works which will improve the accessibility of the site by sustainable modes has been agreed. The detailed travel plan should be subject to agreement by the council and the Highways Agency prior to occupation through the Section 106 process and include targets for use of sustainable modes and actions by the applicants if they are not met. The travel plan should include restrictions on access from regions of East Sussex which is difficult by public transport to be by organised group transport arrangements.

6 PLANNING POLICIES

Brighton & Hove Local Plan:

TR1	Development and the demand for travel
TR2	Public transport accessibility and parking
TR4	Travel Plans
TR5	Sustainable transport corridors and bus priority routes
TR7	Safe development
TR8	Pedestrian routes
TR12	Helping the independent movement of children
TR14	Cycle access and parking
TR15	Cycle network
TR18	Parking for people with a mobility related disability
TR19	Parking standards
SU2	Efficiency of development in the use of energy, water and materials
SU3	Water resources and their quality
SU4	Surface water run-off and flood risk
SU5	Surface water and foul sewage disposal infrastructure
SU9	Pollution and nuisance control
SU10	Noise nuisance

SU11	Polluted land and buildings
SU13	Minimisation and re-use of construction industry waste
SU14	Waste management
SU15	Infrastructure
QD1	Design – quality of development and design statements
QD2	Design – key principles for neighbourhoods
QD3	Design – efficient and effective use of sites
QD4	Design – strategic impact
QD5	Design – street frontages
QD6	Public art
QD7	Crime prevention through environmental design
QD15	Landscape design
QD16	Trees and hedgerows
QD17	Protection and integration of nature conservation features
QD18	Species protection
QD19	Greenways
QD25	External lighting
QD27	Protection of Amenity
QD28	Planning Obligations
EM2	Sites identified for high-tech and office uses
EM3	Retaining the best sites for industry
NC3	Local Nature reserves
NC5	Urban fringe
NC7	Sussex Downs Area of Outstanding Natural Beauty
NC8	Setting of the Sussex Downs Area of Outstanding Natural Beauty
HE6	Development within or affecting the setting of conservation areas
HE11	Historic parks and gardens
HE12	Scheduled ancient monuments and other important archaeological sites

Supplementary Planning Guidance:

SPGBH4 Parking Standards

Supplementary Planning Documents:

SPD03 Construction & Demolition Waste

SPD06 Trees & Development Sites

SPD08 Sustainable Building Design

SPD11 Nature Conservation & Development

7 CONSIDERATIONS

The main considerations in the determination of this application relate to:

- The principle of the development on an allocated employment site
- The impact to the character and appearance of the locality, including designated heritage and landscape assets
- The design and appearance of the development including sustainability
- The impact on biodiversity and trees
- The demand for travel created by the development
- The impact on archaeology

- The impact on flood risk and drainage
- The impact on amenity including air quality, light and noise
- Crime prevention

The principle of development

The site is located within the built up area where development is acceptable in principle. The site is an allocated employment site for high tech and office uses under policy EM2 of the Local Plan. The archive facility falls within its own unique 'sui generis' use and thus represents a departure from the Local Plan. The benefits of the development have to be balanced against the 'loss' of part of an allocated employment site and in the case of The Keep it is considered that there are exceptional circumstances to allow a departure from policy.

The application contains supporting information to demonstrate there is a clear identified need for improved archive storage facilities to serve the city and county. The National Archives have worked closely with the applicant and support the scheme. It is clear that the scheme would be an important cultural facility and have many community benefits. The Libraries and Museums teams fully support the proposal and cite its many positive aspects. The Children and Young People's Trust welcome the proposal as it would provide research opportunities for schools/pupils that don't currently exist in the city. The Sussex Family History Group also fully support the proposal and they would have significantly improved access. It is evident that Woollards Field was chosen after a thorough site search, and it is well placed in terms of public transport, proximity to population, etc.

The scheme would employ up to 35 people (although not all will be new jobs) and, an Employment Strategy would be secured through the Section 106 to ensure 20% of the construction workforce are local. Significantly, the application demonstrates that a substantial part of Woollards Field could be potentially developed in the future for employment use. The submitted illustrative masterplan shows how a scheme of up to 5,640sqm (4-storeys with 50% max parking level) or 3,900sqm (3-storeys) could be achieved on the remainder of the site. Given that height of the development could be sensitive in this location, 4-storeys may be problematic, but this would be tested at any formal application stage. Even if approx 4,000sqm is achieved, this is still a significant quantum of floor space that would make a meaningful contribution towards the city's strategic employment land supply.

As the Economic Development team point out, even though this has been an allocated site since 2005 and had had planning permission pre and post dating that time for office development, it has not actually come forward for development.

The University of Sussex is a partner in the project and The Keep will support and enhance academic and educational facilities, which complies with the aim of emerging Core Strategy Policy DA3 and the notion of the 'academic

corridor” in this location.

As the site is not developed and is in effect ‘open space’, policy QD20 which seeks to retain such sites would be applicable. This does, however, need to be balanced against the fact that this site is allocated and earmarked for development. Also the scheme proposes 0.525 hectares of new public open space, which is a significant benefit and helps meet the aim of policy QD20.

The Economic Development Team and Planning Policy Team agree that a pragmatic approach should be taken to use of the site and support the development of this important facility.

Design and appearance and impact to the character and appearance of the locality, including designated heritage and landscape assets

Policies QD1, QD2, QD3, QD4 and QD5, require development to be of a high standard and to respect the character and appearance of their surroundings. Policies HE6, HE11, NC7 and NC8 specifically seek to protect designated heritage and landscape assets such as conservation areas, historic parks and gardens and national parks.

The development of the site would significantly change its landscape character and this is accepted, given its allocated status. In addition planning permission has previously been granted on the site on numerous occasions.

It is clear from the supporting information that much iterative design work has been carried out at the pre-application stage, involving the 3 partners and numerous user groups, that have shaped the final design of the scheme. This has led to a simple, functional building that meets its brief, which is to be commended. The design and layout of the scheme would meet the requirements of policy HO19 relating to community facilities.

Some concerns regarding the quality of the design, however, have been expressed by the South East Regional Design Panel, the Council’s Design and Conservation Manager and also the South Downs Society. It was considered that the building would be rather uninspiring and lack civic significance. Also some concern was expressed regarding the sense of arrival and its appropriateness in its landscape setting. The Design and Conservation Manager has balanced this against the fact that the design concept is clear and that the proposal would deliver an important cultural facility within a constrained site and budget, and concludes that the proposal is satisfactory.

There was some concern regarding the impact from more immediate views from Lewes Road, where the proposal could appear rather bulky. The preference would be to reduce the height of the repository block, however, due to financial constraints and the desire to maximise the rest of the site for future employment development. The recent changes to the scheme – incorporation of the frieze and enhanced car park planting have been positive

and help the building respect its surroundings. The frieze will alleviate the impact to an extent and help the building to be read, and also additional planting on the Lewes Road boundary is recommended to help soften its impact. This would help meet the reservations expressed by the South Downs Society. The enhanced car park planting would help soften the scheme and blend in better with its semi-rural surroundings. The scheme provisionally suggests incorporation of art or a media wall on the front elevation, in compliance with Policy QD6. This is to be secured via Section 106 and is considered necessary on two counts - for public art, and to improve the appearance of the building, as some concern has been expressed regarding the rather blank stairwell on the front elevation.

A Visual Impact Assessment was submitted with the application. The Design and Conservation Manager confirms that the proposal would have very limited impact on the setting of the nearby Stanmer Conservation Area, Registered Historic Park and Garden and South Downs National Park. This is primarily due to the location of the site on the valley floor. The Conservation Advisory Group and National Park Authority concur with this view.

The materials proposed are considered suitable in principle and appropriate to the locality, and a condition is recommended to ensure their details are agreed prior to commencement of development.

It is considered that, on balance, the scheme will satisfactorily comply with the design policies of the Local Plan, provided conditions are imposed to carefully control.

Sustainability

Policy SU2, SPD08 and SPD03 seek to ensure developments incorporate sustainable measures.

A Sustainability Pre-Planning Report has been submitted with the application and this, together with the Design and Access Statement, have demonstrated that sustainable building principles have been integral to the design of the building. It has been demonstrated that the proposal would meet BREEAM 'excellent', which would make this one of the most sustainable archive facilities in the country. Measures such as a woodchip fuelled biomass energy centre, significant photovoltaic and solar thermal arrays, rainwater harvesting and green roofs are proposed, which are welcomed.

SPD08 seeks a zero carbon development in this location, being a Greenfield site, however, this will not be achieved by the development (predicted to emit 45 tonnes of Co2 annually). This cannot be achieved partly due to financial constraint but also due to technical constraints that are due to specific internal environments required for archived materials. The Sustainability Officer acknowledges this and concludes that the proposal represents a highly sustainable development which has addressed well the challenge of

delivering low carbon design.

Satisfactory provision for waste is proposed within the scheme. There is a dedicated refuse and recycling store and City Clean consider it satisfactory. A Site Waste Management Plan has been submitted.

The proposal would meet, and in some cases exceed standards in SU2 and SPD08, and is to be commended.

Biodiversity and trees

Policies QD15, QD16, QD17, QD18, QD19 and SPD06 and SPD11 seek to protect landscape features and important trees and seek to promote biodiversity.

The site has a significant number of trees within in it, some of which are covered by a preservation order, notably a line of hornbeams adjacent to the railway boundary. An Arboricultural assessment and landscape and ecology reports were submitted with the application. The majority of the mature trees will be protected within the scheme. A number of trees will need to be removed, which is regrettable, however, many of these are at the end of their life or dangerous or are not preserved. This is confirmed by the Council's Arboriculturist. Their loss would be mitigated by provision of substantial planting within the site. An enhanced tree belt to the north-east, and new belt to the south-west is proposed and also other landscaping throughout the site including within the car park, gapping up of hedges and green roofs are proposed. Partial retention/enhancement of the north-east copse is deemed important for historic landscape reasons as it formed part of the original 18th century planting associated with the Stanmer Estate. Its retention and enhancement would also benefit biodiversity.

The Council's Ecologist raises no objection to the proposal, but does express regret at the loss of some trees with bat roosting potential, albeit very low potential. He acknowledges it would, however, be unreasonable to insist on their retention and bat boxes are proposed by way of mitigation. Natural England raise no objection to the proposal. The proposal includes a strategy to protect and enhance protected species including badgers, bats and reptiles and conditions can secure the strategy and ensure potentially adverse impacts to ecology are satisfactorily mitigated against. The proposal will provide new and enhanced habitats to benefit biodiversity and provide green corridors. It will, however, fall slightly short of the 'nature points' required in SPD11. A condition requiring a new wildlife pond is thus recommended by way of compensation for this, as suggested by the Council's Ecologist.

A 7 year landscape maintenance plan is proposed, which is considered appropriate for a development of this type and scale and will be secured by condition.

On the basis of the above the biodiversity, landscaping and arboriculture

policies in the Local Plan would be complied with.

Demand for travel created by the development

Policies TR1, TR2, TR4, TR5, TR7, TR8, TR12, TR14, TR15, TR18 and TR19 and SPG4 seek to ensure that the demand for travel created by the development is met and that sustainable modes of transport are promoted.

The Transport Manager confirms that the traffic impact from the development would not be significant, even when taken in conjunction with existing developments in the locality. Initial concerns expressed by the Highways Agency have been withdrawn, subject to imposition of appropriate conditions. The demand for travel would be adequately met by the on-site car, coach, motorcycle and bicycle parking spaces proposed and through promotion of sustainable modes. As a sui generis use the proposal is to be judged on its merits but based on similar uses, SPG parking standards suggest more disabled spaces are required than the 10 proposed – and a condition is recommended to address this as it is not considered a strong case has been made for the reduced level. Securing sustainable measures is particularly important in this edge of built up area location and measures are to be secured via condition and Section 106, including new footways and cycleways, links to facilitate access to bus stops and Falmer railway station, improvements to bus stops, provision of real-time information and a travel plan.

The following should be secured in the Section 106:

Provision of raised kerb to allow disabled access, new shelter and real-time information at existing eastbound bus stop on A270; Provision of real-time information at existing westbound bus stop on A270; Provision of real-time information in reception area of The Keep building; A fallback payment of £28k towards other sustainable measures if these bus stop improvements cannot be implemented; Provision of pedestrian link from existing westbound bus stop into site including disabled access ramp; Provision of footway at entrance to site to provide a crossing point in front of railway tunnel; Provision of cycle and pedestrian footway through whole site linking to Ringmer Drive/Ashurst Rd.

It is not envisaged that undue conflict would occur with school children from Falmer Academy accessing the bus stop or from parents dropping off. No comment has been received from Falmer Academy. That site is to be secured as part of the current development. The Keep will not be open until 9am, which should avoid one of the more busier times. A travel plan has been secured as part of the Academy development and for The Keep, which will help monitor and manage arrangements.

On the basis of the above, the transport policies in the Local Plan would be complied with.

Archaeology

Policy HE12 seeks to ensure assets of archaeological importance are satisfactorily protected.

An archaeological assessment was submitted with the application and the development has been subject both to desk based assessment and evaluation excavation. The County Archaeologist confirms that the site has potential archaeological significance and raises no objection subject to imposition of a condition to secure a programme of archaeological works so that any features can be adequately recorded.

On this basis it is considered that policy HE12 would be met.

Flood risk, drainage and contamination

Policies SU3, SU4, SU5 and SU11 seek to ensure development does not increase flood risk, does not cause pollution and provides adequate drainage.

A Flood Risk Assessment and Land Contamination Risk Assessment Report have been submitted with the application. These were considered necessary in particular as the site is sensitively located, being within a Source Protection Zone 1 where there is strict control over discharge of water. The Environment Agency (EA) and Southern Water (SW) have been involved since the pre-application stage and the design and drainage strategy has evolved in response to the constraints of the site. The EA and SW consider the submitted reports to be sound and raise no objection to the development provided appropriate conditions are imposed to ensure control over details of drainage etc. The site is located in Flood Zone 1, which is defined as having little or no risk of flooding and the Planning Policy team confirm that the application demonstrates the proposal would comply with PPS25 'Development and Flood Risk'. The Land Contamination report suggests there is some evidence of potential contamination, however, it is likely to pose very low risk. The Environmental Health Team concur and raise no objection and conditions are recommended to ensure potential contamination is satisfactorily addressed.

On the basis of the above, policies SU3, SU4, SU5 and SU11 would be satisfactorily met.

Amenity including air quality, external lighting and noise

Policies QD27, SU9, SU10 and SU11 seek to ensure development does not adversely affect amenity of adjacent occupiers or the locality in general.

The site is located some distance from residential properties – the nearest being to the south over the railway line in Lucraft Road (approx 50 metres), and to the south-west in Ringmer Drive/Ashurst Road (approx 180 metres). In addition the site is set down and is surrounded by mature vegetation. Therefore the proposal would have very limited immediate impact. No letters of objection have been received from local residents, the only letter received

being of support. The City Neighbourhood Coordinator confirms that generally local residents have been enthusiastic about the scheme.

An air quality assessment, noise report and external lighting scheme have been submitted with the application and the Environmental Health Team confirm that the proposal has been designed to ensure it would not have an adverse affect in terms of air pollution, light pollution or noise pollution. They recommend appropriate conditions are imposed to ensure the measures proposed are secured and further details are submitted where necessary.

Given the location and the relatively low key type of use, it is not considered that unduly restricted opening hours should be imposed, and 9am-10pm every day is suggested. Given the potential for conflict with parents and children accessing Falmer Academy it is considered that an earlier start than 9am would not be appropriate – and this is not proposed in any event.

A Construction Environmental Management Plan would adequately address any potential adverse impact from construction.

On this basis the proposal would accord with policies QD27, SU9, SU10 and SU11.

Crime prevention

Policy QD7 aims to ensure development incorporates crime prevention measures.

The Crime Prevention Design Adviser at Sussex Police raises no concerns with the proposal. He has been involved since the pre-application stage and is pleased to see crime prevention measures within the Design and Access Statement. He confirms that landscaping (as opposed to security fencing) will provide good open surveillance. The Police make a number of recommendations such as appropriate lighting, CCTV, signage etc and a condition is recommended to secure these. It is clear that the proposal has been designed with crime prevention as a consideration and having regard to Secure by Design principles.

On this basis, and with imposition of conditions, it is considered that the proposal would comply with Policy QD7.

Conclusion

There is a demonstrable need for improved archive facilities and the Keep proposal will be a welcome addition to the city and provide an important cultural resource. Modern purpose built facilities would be provided within a highly sustainable building. The proposal is considered to comply with Development Plan policies and approval is therefore recommended.

8 REASONS FOR RECOMMENDATION TO GRANT PERMISSION

There is a demonstrable need for improved archive and record storage

facilities. The proposal would provide an enhanced public facility and promote greater access and interest and is a culturally important facility. The proposal would generate employment. The proposal has demonstrated that there is potential on the remainder of Woollards Field to satisfactorily accommodate a significant B1 development. The design is satisfactory and will have an acceptable landscape impact including upon designated heritage and landscape assets. The scheme will be highly sustainable and will meet BREEAM excellent. The demand for travel will be satisfactorily met. The proposal will conserve and enhance biodiversity. Important trees will be retained and adequately protected. Flood risk would not be increased and adequate drainage will be provided. Archaeology assets will not be compromised by the proposal. The proposal will not compromise air quality or cause light or noise pollution. Crime prevention measures will be incorporated. The development is subject to conditions and Section 106 obligations that will ensure the proposal meets Local Plan policy and ensure any potential adverse effects are satisfactorily mitigated against.

9 EQUALITIES IMPLICATIONS

As a public building, it will need to be Equality Act/DDA compliant and it will need to meet Part M of Building Regulations. The Access Officer confirms that suitable space for toilets and escape refuges is proposed. The site is relatively flat and conditions are recommended to ensure the Council has control over the final design of all hard landscaping, including access ramps, to ensure they are inclusive to all.

The Design and Access Statement and Statement of Community Involvement demonstrate that an inclusive design approach has been taken when developing this project. The scheme has been designed to ensure people are able to equally access The Keep, regardless of age, disability, ethnicity or social grouping.