

OBJECTION TO REVISED PROPOSALS FEB 2024

**BH2021/04167 - Brighton Gasworks Land Bounded By Roedean Road (B2066),
Marina Way And Boundary Road Brighton BN2 5TJ**

Submission on behalf of the Kemp Town Society (KTS)

1. OVERVIEW / SUMMARY

The Kemp Town Society (KTS) welcomes the development of the site. It has remained undeveloped for many decades, and is a sad reminder of industrial decline. However, it still objects strongly to the revised proposals submitted to the Council for the redevelopment of Brighton Gasworks.

The Grade 1 Kemp Town Estate is a Conservation Area of national importance. Uniquely among Britain's Conservation Areas, all its buildings are listed. This status demands that it is given exceptional protection against harm from developments that could damage its quality and character.

The proposed redevelopment of the Gasworks is an urban conglomeration, including densely packed buildings up to 12 storeys tall, right beside the Grade I-listed buildings of the Kemp Town Estate. The overwhelming height and mass of this development will be most apparent to visitors coming to Brighton from the north, over the South Downs, and from the east along the coast. It will give a dreadful first impression of Brighton, and is totally at odds with—as well as out of proportion to—the elegance of the terraces, crescents and squares to the west.

KTS notes that the number of dwellings has now been reduced to 495 from 565. Nonetheless, the presence of so many new residents on a cramped site will have a very serious and detrimental impact on the current fully used infrastructure, the quality of life of residents and visitors, and public health and safety.

We had hoped to discuss these points with Berkeley/St William in person, but the meeting that was eventually offered fell after the deadline for submissions and, at short notice, proved too difficult to organise.

2. IMPORTANCE OF HERITAGE ASSETS AND LASTING HARM FROM THE GASWORKS PROPOSAL

From Brighton Pier to Roedean School, Marine Parade and Marine Drive together form one of the longest continuous stretches of seafront in the country, of unparalleled architectural quality. There are over 200 listed buildings and structures along its two-mile length, making it the country's most impressive man-made facade to the sea. Immediately adjacent to the proposed Gasworks development is the Kemp Town Conservation Area, which incorporates the Grade 1-Listed Lewes Crescent, Sussex Square, and Chichester and Arundel Terraces; and the Grade II Listed French Convalescent Home. To the east lie locally listed Marine Gate and Grade II-listed Roedean School.

It is imperative that any development on the Gasworks site is of first-class architectural quality and respects the scale, height, character and general excellence of the neighbouring buildings. The revised proposals conspicuously fail to do so.

3. DESIGN ISSUES - HEIGHT, BULK, MASSING, LOCALISED CLIMATIC CONDITIONS

KTS notes that three of the buildings have now been reduced by 2-3 storeys. Since no 3D modelling has been made available to the public (surely standard practice in any major development?), and since all we have is a thin blue line drawn on photographs, it is very hard to tell what the true visual impact will be. It is clear, however, that ten of the 12 proposed buildings will still be taller than six storeys (18m), in an area where buildings of more than 18m have not previously been allowed.

KTS also notes that Berkeley/St William has now acknowledged its obligation to make 40% of the dwellings "affordable", as required by the City Plan. However, it is assuming that these units will be funded by Homes England, avoiding any need to risk its own funds. There is therefore no guarantee as yet that these affordable units will actually materialise.

Studies are apparently being done to reduce wind tunnels between the blocks. But the revised proposals do not address the sheer density of the blocks, the lack of open spaces and the restriction of sunlight, especially in the lower flats.

4. LEARNING FROM THE BRIGHTON MARINA APPEAL

The Planning Inspector for the Brighton Marina Appeal, in a report endorsed by the Secretary of State, criticised the jarring relationship of the Marina proposals to the Heritage Assets in the immediate vicinity, and the appeal was rejected largely on those grounds.

The revised Gasworks proposals seem not to have learned from this decision. Not all the buildings have been reduced in height. And nothing has been done to improve the overall design to make this development reflective of the lively, innovative but elegant seaside city where it proposes to be. That was another reason why the Marina appeal was rejected.

A copy of our objections to the Gasworks development is being sent to the Secretary of State.

5. SITE DECONTAMINATION

We note that the Gasworks site is not identified as a 'special site' under the Contaminated Land Regulations of 2006. Decontamination procedures are, in effect, excluded from this planning application.

However, due to the significant risks of developing the site, KTS recommends a detailed contamination survey before the planning application is considered further. This would establish that there are no health and safety risks to Kemp Town Estate residents, visitors and neighbouring areas. The height and bulk of the proposed buildings, will maximise risks of deep excavations into contaminated ground. The more extensive those excavations, the greater the likelihood that contamination will be widely dispersed.

6. INFRASTRUCTURE

A development on the proposed scale will inevitably stretch the demands of current infrastructure. The planning application does not address the issues resulting from 495 new residential units and around 1,000 new residents, including:

- acute pressure on current medical and school provision
- pressure on parking and public transport, all of which are currently fully utilised by local residents, businesses and visitors

- disruption of the congested A259 and Eastern Road, with additional traffic during the construction stage and afterwards
- impact on access to the Royal Sussex County Hospital as a result of additional road usage
- rising pollution levels from increased vehicle usage
- pedestrian safety risks from increased traffic.

On these grounds, KTS registers on behalf of its members its strong objection to the submitted revised proposals for the redevelopment of Brighton Gasworks.

We applaud, and concur with, all the points made by the Brighton Society in Section 2 of their objections.

We also note that the Phoenix development in Lewes illustrates the difference that good and sensitive design can make to brownfield development. We would like to see such sensitivity and quality applied to the Gasworks site.

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