



Development Control
Brighton & Hove City Council
Hove Town Hall
Hove
BN3 3BQ

Sent by email to: planning.applications@brighton-hove.gov.uk

20 September, 2017

Dear Madam / Sir,

Objection to planning application: BH2017/00492 Preston Barracks, Mithras House, Watt Building Lewes Road Brighton BN2 4GL

On behalf of Brighton & Hove Friends of the Earth (BHFOE) I would like to object to the above planning application with regard to its economic, environmental and social impacts arising from the proposed transport arrangements. While there is much to commend the development, it is unfortunately undermined by its significant transport and health impacts.

In summary our objection is:

- The increase in car parking by 28% on current provision on the sites that will increase traffic and congestion on surrounding roads, particularly in Hollingdean Road and Lewes Road south of the Gyrotory
- This risks delaying compliance with nitrogen dioxide levels on these roads which is contrary to legal rulings to reduce pollution below legal limits in the shortest possible time and is contrary to the Council's own planning policy
- The two additional junctions, even with a green wave will slow down buses and cyclists
- The extra congestion on Lewes Road combined with the delays from the new junctions is a double whammy for bus services, slowing them down while increasing their costs. This will make services less attractive and is contrary to the Council's planning policy
- No improvement is proposed to access Moulsecomb station which is not fully accessible on westbound services (into Brighton)

- Cycle parking accessed by steps, even with ramps, is not desirable, and will be difficult to use with electric bikes, which are heavier than standard bikes.
- Cycle parking for visitors, along with other street furniture, risks being overrun with residents' bikes, while less accessible residents' cycle parking is left unused.

What we'd like to see to make the development acceptable

- A cap on the overall car parking provision at 621 spaces – the current provision, and lower if possible to achieve positive benefits such as reducing congestion
- Improvements to make Moulsecoomb station full accessible
- A rethink of the cycle parking for both residents and visitors

Car parking excess

Current provision across the site is 621 car parking spaces, which was proposed to increase to $683 + 166 = 849$ spaces (from Council officer's [Highways report](#), page 11). This is an increase of 228 spaces, over 36% above what is currently provided. Since the initial application was submitted this has been reduced by 49 spaces to a total of 800 spaces, representing a 179 space, or a 28%, increase.

Given that there is already nearby congestion and air pollution that is above legal limits, the development should be refused permission. As research shows, increasing car parking encourages greater car use, as well as costing more to build and takes away space and land that could be better utilised, such as for more housing, or to make up the shortfall in employment land.

BHFoE is at a loss to understand what mitigation can be provided that will reduce the number of cars that use Hollingdean Road and Lewes Road south of the Gyratory and hence the pollution there. The additional parking represents a substantial increase and that will push more cars and pollution into areas which are already above legal limits. The only viable and successful mitigation is to reduce the car parking to the existing levels across the whole site of 621 spaces. That way extra journeys cannot be created. Preferably, a slight reduction on current levels could actually improve congestion and pollution and present a win, win situation. Given the high levels of sustainable access to the site, this is a perfectly feasible proposition.

Not only will the extra cars associated with the development increase congestion and pollution, but the new signalised junctions in an already busy area with many other signalised junctions, will exacerbate these impacts. Even with the improvements to the scheme design, this development will slow buses down, not just at the new junctions but particularly around and south of the Vogue Gyratory where the extra traffic from the development will cause more problems, making the buses less efficient and more expensive to operate. This could cause some people to switch back to driving. The higher costs could also force up fares in the long term and will make it difficult to reduce bus fares, an ambition of many in the city who see the fares as expensive, and an unnecessary burden on poorer members of society.

Planning policy for the site

DA3 Lewes Road The strategy for the development area is to further develop and enhance the role of Lewes Road as the city's academic corridor by supporting proposals which:

- improve further and higher education provision in the Lewes Road area;*
- facilitate improved sustainable transport infrastructure that provides choice, including travel by bus, walking and cycling;*
- secure improvements to the townscape and public realm;*
- deliver inter-connected green infrastructure and biodiversity improvements, contributing to Biosphere objectives (see policy CP10);*
- **improve air quality in the Lewes Road area;** and*
- deliver the amounts of development set out in part B below.*

A. The local priorities to achieve this strategy are:

...

*2. **Promoting and investing in improved bus, cycling and pedestrian routes along Lewes Road from The Level to the Universities in partnership with public transport operators in order to achieve a modal shift and thereby help reduce the impact of traffic, in particular on air and noise quality...***

*7. To **ensure improvements to local air quality** through implementation of the council's Air Quality Action Plan. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible...*

1. Preston Barracks and Brighton University (Mithras House and Watts/Cockcroft Site) The city council will work with the University of Brighton and other partners to provide a mixed use employment-led development comprising a new business school, 10,600sqm B1 employment floorspace, including an Innovation Centre; 750 rooms of student accommodation; 300 residential units and other ancillary supporting uses. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies, guidance in the adopted Planning Brief for the site and the following criteria:

a) Proposals will be required to have a high standard of public realm, including a central square, and effective links across the Lewes Road and to Moulsecoomb Station in order to improve the quality and permeability of the area...

*d) **Sustainable transport infrastructure** will be required to support the scheme and to ensure that there is no adverse air quality impact...*

Thus, it is clear from the policy that an improvement in air quality is sought as are improved public transport, pedestrian and cycle routes. Yet this development does none of these, with the possible exception of the pedestrian bridge. Indeed, until changes were negotiated with the developer, the cycle lanes were going to be severely compromised, and even with changes the

extra junctions will make things worse for cyclists and buses. A green wave will not solve this problem for buses because there is a bus stop in the middle of the new junctions.

Equally, the extra car parking associated with the development will generate more traffic and hence more pollution. This will lead to more traffic along Hollingdean Road, at the Vogue Gyratory and south of the Vogue Gyratory all areas where nitrogen dioxide levels are above legal limits. BHFOE does not believe that predictions of future air quality can be relied on given the emissions cheating that has gone on with vehicle manufacturers and the failure of past predictions of falling emissions. Indeed, the latest Euro 6 engines are still being shown to be well over the allowable limits in most new cars (not to be confused with Euro VI engines in buses and HGVs) so it is likely that future forecasts remain over optimistic.

In addition, BHFOE is not convinced that the cumulative impacts of other developments in the city such as the Royal Sussex County Hospital and Circus Street, both of which have more car parking and will generate more car trips along Lewes Road have been properly considered. Lewes Road south of the Gyratory struggles with present traffic levels. Extra cars from these developments will compound the situation.

While provision of cycle parking, spaces and bikes for the bike share scheme, car club spaces, electric charging points for electric cars (note not bikes though) and the pedestrian bridge are all welcome, none offset the increase in car parking. In fact, while car club membership allows people not to own a car it can mean a greater use of each car, so could increase the overall traffic generated per car parking space.

Train access

It is very disappointing that there is very little mention of access to Moulsecomb Station which currently is poor and not fully accessible. It is something that was raised by the South Downs National Park Authority but does not appear to have been addressed. This is an opportunity to make the station fully accessible and therefore increase people's options travelling to the site. At present the only level access to the station is to its eastbound platform, the southbound platform only accessible via the footbridge or a long flight of steps.

Cycle parking

The cycle parking is largely welcome but it needs to be made more accessible. It is not clear whether improvements have been achieved since the application was submitted but BHFOE has three concerns:

1. Accessing cycle parking via stairs – this is not practical and should be avoided. As the popularity of electric bikes increases, there will be increase demand for these to be securely parked. Yet they are heavier, generally over 20kg and therefore for many people they will be too heavy to manoeuvre up stairs, even on ramps. (Most ebikes only have power assistance when they are pedalled).

2. Whether there is sufficient cycle parking near main entrances to buildings for visitors and how this cycle parking will be kept free for visitor use? Many residents will be tempted to park their bikes in these locations rather than the less accessible residents' parking, particularly if they are only accessible via stairs or lifts.
3. The lack of mention of any charging points for electric bikes.

Controlled parking zone

This will be essential to manage parking on surrounding streets in both Moulsecoomb and parts of Hollingdean, north of the railway line, at the developer's expense and at no cost to local residents. It should extend far enough to deter people from parking beyond it and walking to the development.

Overall, we hope that these concerns will be addressed and that the development can then proceed. The car parking is not essential to the viability of the scheme, but it does massively increase its impact. Capping it at current levels (not just for the university but the whole site) would address the concerns on air pollution and help manage congestion on Lewes Road rather than exacerbating it.

I trust that this is clear but should you require any further information please do not hesitate to get in touch.

Yours sincerely,

Chris Todd

Planning & Transport Campaigner