

Cllrs Rufus, Kitcat, Taylor & West  
% Kings House  
Grand Avenue  
Hove BN3 2LS

Guy Everest  
Planning Officer  
Development Control  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ

1st December 2008

Dear Guy,

**Re: Planning Applications BH2008/02095 & BH2008/02808**

We wish to object to the application for conservation consent and proposed plans by Taylor Wimpey to redevelop the former Royal Alexandra Hospital site. We ask that these comments be circulated to all members of the Planning Committee. While we recognise that this vacant site needs to be put to good use for the residents of the city, we do not feel that the current proposals are good enough, in terms of design, in terms of impact on neighbours, and in terms of the loss of the current buildings.

**The Existing Building: Worth preserving**

No plans for demolition can be considered unless the replacement development is of high enough quality in design terms to justify the loss of the current buildings. The site is highly prominent and visible, and due to its history has a high level of public resonance for ex-patients and the parents of children who passed through the doors of the RAH. This sets a high benchmark for the new development to meet, which the current plans fail to do. In particular we feel that any redevelopment of the site should retain buildings on the corner of Dyke Road/Clifton Hill as this façade is the aspect of the site that has the greatest resonance with the community, and is of most architectural value. If conversion plans demonstrate that the retention of the building in its entirety is not feasible, we believe that the façade at least should be retained to preserve this feature of the site. Therefore, we feel that the proposed demolition of the existing buildings and the form of design in the rebuild runs counter to policy the B&H Local Plan 2005 HE10 (Buildings of local interest).

**The New Proposals: Bland, uninspiring design**

These revised plans are still very bland and uninspiring, an off-the-shelf approach to design that is wrong for such a site, and inappropriate for a conservation area. Furthermore the scale of the development is too great, particularly on the frontage at the corner of Dyke Road/Clifton Hill and opposite the residential properties of Dyke Road. Revised plans have taken bulk from the rear (North end) of the proposal to place it

overlooking Dyke Road residents, in doing so the developers have attempted to satisfy the residents of Homelees House but made the situation worse for Dyke Road residents who are concerned for their loss of privacy by the overlooking residential units in the scheme. So we agree with English Heritage that the scheme along Dyke Road is too bulky. Hence the design runs counter to Policies QD1 (Design – Quality of development and design standards) and QD2 (Design Key principles for neighbourhoods), while the setting of this proposed development in the conservation area is counter to policy HE6 (Development within of affecting the setting of a conservation area).

The community garden in the proposal is very small and mostly inaccessible due to the supporting walls to retain the various levels of the landscaping. Furthermore the plans appear to show a gate on the garden which we believe has been proposed to be locked whenever the surgery is closed. In combination with the private nature of the remaining proposed gardens and block C being further south than the original building there is little usable public space in this scheme at all.

In sustainability terms we believe that Level 5 on the Code for Sustainable Homes should be the minimum achieved for such a significant development. Given Brighton & Hove's limited aquifer-based water supply we believe more should be provided in the scheme to reduce water use. Contrary to policies SU2 of the Brighton & Hove Local Plan and SPGBH16: Renewable Energy and Energy Efficiency in New Developments there remain a large number of bathrooms with no natural light or ventilation.

We are deeply concerned by the traffic and air quality consequences of the delivery and burning of biomass fuel in the scheme's proposed biomass plant. We do not believe it is appropriate for such a central location to be creating any local emissions at all. We also believe regular delivery by large heavy goods vehicles such as a 4-Axle Tipper suggested in the application (pictured) to be inappropriate. We note that the Council's own Environment Health and Sustainability officers also voice such concerns.



## **Demolition: The case lacks credibility**

The District Valuer clearly found that TaylorWimpey had overstated the costs of conversion by just over £2.8 million. This cast doubt over the integrity of TaylorWimpey's entire case for demolition. The District Valuer's reports were completed before this autumn's further collapse in market conditions and only considered a single case of a scheme comprising of residential and a surgery. We believe a number of other types of schemes should be examined mixing alternative uses such as educational, small business and residential. HE8 states that demolition will not be considered only if "viable alternative uses cannot be found". As only one scheme has been considered we are not satisfied that this policy has been satisfied, there is no evidence of other uses having been considered.

We are very concerned that the demolition proposals are justified on the basis of a conversion plan that shows a decrease in the numbers of dwellings provided of around 100 units, two thirds of the original number. The extent to which the conversion plans reduced the number of dwellings in parts of the site not affected by the retained buildings is baffling, and as a result the conversion plans lack credibility. The District Valuer's report considers up to 147 units in a conversion plan versus 55 for TaylorWimpey.

We strongly believe that the case for demolition has again not been satisfactorily made.

## **Support for the Montpelier Surgery**

On a positive note, we welcome the inclusion of space for the GP facility, which has rightly attracted much support from the community. Nevertheless we are concerned that the current scheme has the surgery entirely located in the basement with most rooms in the plans provided to the surgery management having no natural light. We believe this is contrary to sustainability and well-being to have so many rooms without access to daylight specifically policy SU2 of the Brighton & Hove Local Plan and SPGBH16: Renewable Energy and Energy Efficiency in New Developments.

However, we do not feel that the current plans are the only means by which the GP surgery can be catered for, and urge that the high level of support demonstrated be understood as support for the surgery and not for the development as a whole. Thus we argue that this scheme should be considered on its own merits rather than on the basis of the issue of the surgery's future location.

## **In Conclusion**

We are particularly apprehensive, given the weakening property market and particularly TaylorWimpey's deteriorating financial position, that approval will lead to a slow sale of the land with permission, possibly after demolition. This threatens leaving a derelict gap site in the heart of beautiful city centre conservation area. Regardless it is unlikely that the Montpelier Surgery will have appropriate facilities available at the old Royal Alex Hospital site for many years and so we are working to help the Primary Care Trust explore alternatives.

We do want to see a good use of this significant site, catering for the needs of the city, while recognising the importance of the history of the site, of the conservation area, and of the existing community and neighbours. This application should be rejected as falling short

on all these issues, and the developers encouraged to work more inclusively with other stakeholders to reach that outcome in a future planning application.

In summary, this objection is based on the following issues –

- No justification for demolition (HE10)
- Exploration of viable alternative uses has not been exhausted (HE8)
- Inappropriate scale and design of building (QD1 and QD2)
- Adverse impact on conservation area (HE6)
- Adverse impact on traffic and air quality

We urge you to refuse this planning application.

Yours,

**Cllr Sven Rufus, Cllr Jason Kitcat, Cllr Pete West, Cllr Keith Taylor**  
Representing Regency Ward & St Peter's and North Laine Ward