



Rottingdean Parish Council comments on planning applications BH2017/02680 & 02681

FORMER ST AUBYNS SCHOOL, ROTTINGDEAN

1. Introduction

1.1 This is the agreed response of Rottingdean Parish Council (RPC) to applications BH2017/02680 & 02681.

1.2 For Rottingdean, these are undoubtedly significant proposals in that:

- the Scheme comprising a potential 93 homes is equivalent to the *whole of the last 10 years* housing growth taking place in Rottingdean;
- the development location is the centre of the village;
- the development site is in a valued *historic village setting* long recognised by its formal 'Conservation Area' designation;
- The development site is approximately 50 metres from the AQMA.

The potential to adversely affect this historic locality, heritage/visitor offer, and the well-being of the local community is especially significant.

1.3 Nonetheless, Councillors clearly recognise that '*breathing new life*' into the large, empty School site – *if done well* - is timely and has potential to benefit the amenity, appearance and prosperity of Rottingdean. It will increasingly serve no-one to continue with the 'fears & uncertainties' which surround an empty – albeit historically important site, which is prominent in anyone's eyes. There is an on-going deterioration of the site, especially the Grade 2 listed building – Field House.

1.4 Councillors are considering and will respond *separately* regarding the management issues if the proposed 1.4 hectares of the former Playing Field (totalling 2.4 hectares) and some buildings (e.g. Sports Pavilion & Chapel) and other assets are agreed to be transferred to public ownership under the stewardship of the Parish Council.

2. St Aubyns Planning Brief

2.1 In formulating this response, RPC has taken account of the aspirations and planning guidance laid out in the 2015 Planning Brief, which the Parish Council was involved in developing.



2.2 We appreciate the efforts made by Fairfax to respond to this document, in particular with regards to the rich heritage of this site. We welcome: -

- The proposal for a high-quality conversion of the original Field House;
- The retention of the 2 characterful courtyards and associated natural and built features within them;
- The retention of as much of the flint wall site boundary as is practicable and the historic Twitten;
- The retention of the former dormitory cottages;
- The proposal to make some of the former playing field available for public enjoyment and recreational use.

3. Impact of *additional* homes proposed

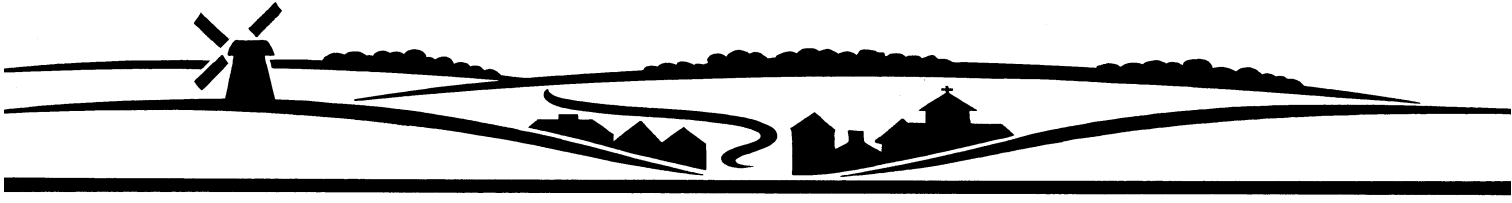
3.1 Parish Council comments are under the following headings in this document:

- **Density and overall appearance** (BH2017/02680)
- **Economic viability**- lack of transparency on financial viability of the housing scheme (& its many possible permutations);
- **Direct and cumulative impact on transport systems** – overcrowding, physical congestion of village space & air pollution; (plus some on-street car parking losses) from increasing reliance on private car ownership;
- **Impact of additional traffic on AQMA**
- **Pressure on services** – Village GPs/dentists & primary schools
- **Construction period** – enforcement of site-working that respects fully the community and an historic village environment.

4. Key issue – density and overall appearance

4.1 The density on the proposed greenfield area of the site is above average levels in the village and is inappropriate in this sensitive location.

- IF the Southern area of the Field is built on as proposed, there appears an intensive mass of 'building' in the south-west corner of the site; the somewhat claustrophobic 'feel' of this housing- estate layout being exacerbated by the dark appearance created from use of hard (brown & dark grey) materials.



- an emphasis on hard paved vehicle areas rather than green and safe pedestrian/shared community walkways within and through the housing development; e.g. 'there is not an unimpeded walking route through to the High Street without traversing a car parking zone;
- a potential for a jarring visual impact on strategic Village views including from the Beacon Hill LNR; as proposed intensive development along the southern axis of the field is clearly visible from high points around the Village.

Heritage/ 'brownfield' design elements

- 4.2 The style and general design throughout the remaining Scheme for the 'brownfield' elements appear is thoughtful and should create attractive living conditions respecting the historic feel of the area.
- 4.3 The proposed restoration of the retained buildings is therefore welcomed.

5. Key issue- economic viability

Development of Greenfield site (BH/2017/02680)

- 5.1 Councillors ideally would prefer full Local Green Space designation for the *entire* former School Playing Field. This is in response to our [2016] consultation undertaken to support an emerging Neighbourhood Plan and a proposal therein for protecting the *whole* of the private field and opening up this central green space for the community, and for visitors to Rottingdean too.
- 5.2 The Parish Council welcomes sympathetic redevelopment of the old school 'brownfield' site, but remains to be convinced whether the degree of building proposed on the former playing field at over 50% of the total number of units is *appropriate* or whether the re-development of the former school 'brownfield' site is only viable *if such a significant portion of the* field is intensively turned over to a residential estate. This is a key issue and one which cannot be addressed without the District Valuer's appraisal.
- 5.3 Should the development for housing of (1 hectare of the total 2.4-hectare) private field) be demonstrated as being economically essential for the viability of the overall development, RPC *do not* nevertheless consider that the current housing proposals on the Field are sympathetic enough to their surroundings as previously outlined.



6.Key issue – direct & cumulative impact on current transport systems

Traffic

- 6.1 It is established that the projections for congestion levels on the A259 taken from the base data do not take into account the real increase in traffic levels.
- 6.2 The Rottingdean High Street junction with the A259, according to the TA, is just fully loaded (90.7%) in the evenings and puts the queue of traffic at 50 cars from Nevill Road to the traffic lights at Rottingdean. At this level the extra traffic would have a minimal impact on speeds and delays. However, other traffic data sources put congestion at over 130% and indicate queues exceeding 200 vehicles, way beyond Nevill Road at which level the impact would be very significant.
- 6.3 Therefore, any increase in vehicular traffic through the High Street will add to extra movements coming from the proposed developments at
- Meadow Vale
 - Hodden Farm 450 units
 - Other incremental developments where small single residence sites are increasingly used for multiple dwelling units

It is the *cumulative* impact of these which concern RPC the most.

- 6.4 The RPC remains very concerned about the levels of traffic and congestion that any additional traffic will have on the well being, health and safety of the residents and believes ways of overcoming this need to be explored.
- 6.5 There are concerns about the access to the site, the turning onto Steyning road and traffic turning right at the end of Newlands Road onto the A259 going west toward Brighton. This is already considered a dangerous turning.

6.6 AQMA

- 6.6.1 Rottingdean High Street experiences high pollution due to both the number of vehicles moving through the High Street and congestion levels both within it and at the A259 Junction this frequently causes queuing in the narrow canyon area at speeds claimed by the traffic assessment to be 5KPH but have been observed to be at less than 2.5 KPH and sometimes stationary. This means vehicles spend twice the time in the canyon and emissions will be higher to such an extent that the threshold value will no longer be 'negligible'. Nitrogen Dioxide as measured by BHCC show concentrations very close to the legal limit. There is inadequate volumetric dispersal of traffic fumes in the canyon.



6.6.2 The RPC is very concerned that NO₂ emissions will increase as a result of the additional traffic from the development. The claim that the traffic of the extinct school can be used to offset the impact is not supported, the school has been closed for four years and the levels of air pollution continue to be close to the limit. The 'school runs' suggested in the TA do not stand close local inspection and would not have been used by the majority of parents. More likely routes would have been parents not entering the High Street at all.

6.6.3 Parish Councillors **do not** accept that there will be minimal impact to overall volumes and air quality from these proposals. A traffic increase will come from these developments from deliveries to the houses, from visitors, trades and service vehicles.

6.6.4 Overall it is unlikely that concentrations will fall below the annual mean maximum of 40 µg per cubic metre **without proactively managed change to transport systems and behaviour.**

7. Key issue - pressure on services

7.1 We are concerned about the impact of 93 additional homes on primary schools, GPs/ dentists. These village services are either currently oversubscribed or come under strain and a further potential 300 plus inhabitants need to be responsibly served by planned provision in this area.

7.2 Currently the GP practice on Meadow Parade has had to absorb patients from the Woodingdean Ridgeway surgery which has now closed. Meadow Parade surgery has also recently reduced their hours of opening.

8. Key issue – construction period

8.1 RPC is worried about the increase in heavy lorries, dust and noise during the construction period. Adequate safeguards must be provided for works-related traffic, and parking for construction workers.

8.2 RPC requires: -

- effective enforcement of responsible site-working practices covering restricted weekend working, plus weekday start and end times properly respected;
- a locally recruited workforce where possible.



9. Further comments/observations

Ecological Impact assessment

- 9.1 *RPC is broadly content with the methodology applied to produce sound ecological assessments.* RPC support the request arising out of the Historic Environment assessment that there should be a geophysical survey of the open space where groundworks are planned.

Chapel & Sports Pavilion

- 9.2 The Application plans do not detail to what extent the Chapel and the Sports Pavilion will be renovated nor how the Chapel will look once the buildings which surround it are removed; this requires clarification.

Treatment of The Twitten

- 9.3 RPC agrees that the removal of the existing hedges along the Twitten should be taken out of the Scheme. While removal might be a way of improving pedestrian security along this route; it would alter irrevocably the defining characteristics of a Sussex Twitten. A reduction of Hedge height to 1.5 metres would be welcomed to aid views across the field.

Section 106 Monies

- 9.4 Should the St Aubyns applications be approved, RPC see pressing priority for Section 106 monies to be towards:
- traffic management schemes;
 - improved public transport especially to the north of the village;
 - road and pedestrian safety improvements;
 - Maintenance of St Aubyns Field for a specified term.

10. Overall RPC view

RPC has set out its reservations about the Scheme in this document.

- RPC however, considers there has been good attention to detail to ensure that buildings of architectural and historic interest are preserved whilst being brought back into viable use and incorporated back into the Village;
- Lessons have been incorporated from the previous planning refusal and the pre-application negotiations with BHCC and stakeholders appear to have addressed issues for the retention of buildings;
- The mixed tenure of the housing scheme is very welcome, including the provision of a number of affordable units.