

A recent history of Round Hill's planning concerns 2013 contin.

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15 July 2013 - Veolia's proposal to extend opening hours, to include weekends, denying neighbours of periods of respite from noise.

**NO REST FROM INDUSTRIAL
NOISE UP TO 15 HOURS A
DAY, 363 DAYS OF THE YEAR**

OBJECT NOW!

Veolia have made an application to extend their operating hours at the Waste Transfer Station and Materials Recovery Facility. This means residents living near Hollingdean Depot are likely to be exposed to noise and odour 7 days a week – including Bank Holidays!

Is it fair to extend operating to all-day Saturdays, Sundays and Bank Holidays? And to finish operating at 10pm!?

OBJECT TO THIS APPLICATION NOW!

Go online to www.brighton-hove.gov.uk and find
Planning » Planning applications » Planning register

Application number: BH2013/02219

JUST SOME OBJECTIONS TO VEOLIA'S PLAN TO STAY OPEN 7 DAYS A WEEK:

- No time to host friends in our gardens without the threat of disturbance from industrial noise.
- Longer operating hours impacts on the odour nuisance as vehicles entering the yard during hot weather are often very dirty and smelly as they are arriving.
- 2,244 residents felt the Hollingdean Depot was the wrong location. The location has indeed proved inappropriate.
- Do Hollingdean residents want extra HGV movements in their neighbourhood during parts of the week when children are not at school?
- Veolia has misled the wider public about their continued inability to prevent odour from buildings which lack the quality of design needed.
- Cramming a large MRF, as well as the WTS, into an inadequately sized site has not left room for sufficient landscaping within the southern perimeter. The facilities are not adequately screened and are too near to Round Hill homes and gardens!
- The complaint-system for reporting noise nuisance is operated by Veolia's main client (Brighton and Hove City Council) and is not one in which Round Hill residents have confidence.
- 2,244 residents objected to Veolia's original planning permission in 2006. Application BH2013/02219 aims to scrap most of the gains those objections achieved. *Are we now going to stand by and let Veolia erode the only periods of peace and quiet we have from industrial noise?*

If you click on either of the first two pictures on the above page, providing your computer has Windows Media Player and sound you will be able to hear some audio clips of the kind of noise we have to put up with on weekdays and many Saturdays.

The Council's online comment form for Veolia's planning application BH2013/02219 is at:

http://ww3.brighton-hove.gov.uk/index.cfm?request=c1199915&action=showDetail&application_number=BH2013%2F02219

(Click on the COMMENTS tab shaded in light blue)

The proposal is:

1. to extend daily closing time for receipt/handling/removal of both recyclables (MRF) and black bag domestic waste (WTS) from 19.00 hours to 22.00 hrs. The proposed start of operation for MRF & WTS 07.00 hrs remains roughly the same.

2. to extend operation to 7 days a week, including Sundays and Bank Holidays (only exception is Christmas Day & Boxing Day) so that the MRF & WTS are permitted to receive/handle/remove waste at any time between 07.00 and 22.00.

From 1st June through to mid July 2013, the amenity of residents in the north of Round Hill has been considerably blighted by high noise levels (catch-up from industrial action?) and some of the smelliest odour escapes since operation of the Waste Transfer Station began early in 2009.

Given what we have had to put up with and at the very times when residents most want to use their gardens, it would be reasonable for the Environment Agency to withdraw altogether what is effectively "a licence to pollute".

Application BH2013/02219 to extend hours and operation to Sundays & Bank Holidays comes at a time when the Environment Agency, which grants Veolia its operating licence has failed to act satisfactorily on nuisances (odour as well as noise) which it is unreasonable for residents to put up with ANY day of the week.

What is even more unreasonable is that both the Council and the Environment Agency are using a complaint-led system to monitor noise & odour nuisances respectively. They put complicated procedures (keeping detailed noise & odour diaries etc) in the way of any resident who complains and expect us to do their monitoring for them. The last thing which residents who are sick of industrial noise and smell want to do is to spend their lives focusing on the very nuisances which are driving them up the wall.

They ask us to rate odour on a scale of 1 to 6, when the reason why we are ringing to complain is that we cannot tolerate the nuisance. These complaint-minimisation techniques are there to discourage complaining. They are quite frankly insulting. Very few people enjoy picking up the phone to complain. A response which requires the victim to focus on the nature of the bully's punch is neither worthy of a Local Authority or an Environment Agency which wants to avoid scrutiny from above.

A campaign to oppose Application BH2013/02219 needs to go somewhat wider than the proposal itself. The main effect of the proposal, if granted, would be to remove any day in the week when we can be sure of some respite from industrial noise.

24/7 operation of The Dump might in fact assist in odour management since the Waste Transfer Station is of such poor design that it cannot contain odour. When domestic waste is left in the WTS over a three or four day Bank Holiday weekend without being moved on, it becomes very smelly. During hot weather, a lot of waste is very smelly even at the point when it first arrives in Hollingdean Depot. The quicker it is moved on, probably the better.

The wider problem is not operating hours. It is that Veolia's facilities are in an unsuitable location, as recognised by our political representatives both before and after planning permission for the WTS and MRF was granted in 2006. Hollingdean Depot is certainly too tight an area for both the WTS and MRF, neither allowing space for adequate landscaping on the southern perimeter, nor allowing room for an adequately contained building design (e.g. incorporating two sets of doors at each entry/exit point) .

Possible ways ahead could include downsizing the operation at Hollingdean Depot. Dealing with glass recycling and food waste elsewhere (dedicated food waste collections like in several London Boroughs) could be part of the solution. The current Council administration has inherited this problem and is starved of funds. Politician-bashing won't solve the problem. It will need to be step-by-step, but Political Parties should be working together to down-size this unsuitable Dump rather than increase its operating hours.

Ted

15 July 2013 - Use and misuse of the Local Press RE measures to control stink. Complaint minimisation systems in action.



"Simon" wrote: thank you Ted - I hope everyone in Round Hill will object to this. Did the Argus ever get in touch - this would make a great story.

Simon, The Argus saw fit to trail Veolia's Good News about their own skills in odour management, but not my account of the stink which nearby residents have to put up with.

Veolia's wonderful new system for zapping odour particles was hyped in The Argus (3rd January 2013) as NEW TECHNOLOGY TO ELIMINATE WASTE STATION'S STINK

<http://m.theargus.co.uk/news/>

[10138737.New technology to eliminate waste station s stink/](http://m.theargus.co.uk/news/10138737.New-technology-to-eliminate-waste-station-s-stink/)

The printed version of the same report was captioned SAYING GOODBYE TO STATION'S STINK.

I learnt on the phone this morning from Bunmi Aboaba of the Environment Agency that the UV lamp/ozone system for breaking down odour molecules was never installed in The Waste Transfer Station since the Environment Agency considered the system unsafe in a place where there are people around.

Having had to put up with the stink of the Dump in our garden throughout most of June 2013 and July 2013 (to date), my impression is that Veolia has been trying to mislead the general public by trailing their own fictitious news in the local press.

They are still using deodorisers in an optimistic attempt to neutralise the odour particles in a poorly designed installation with single doors which are frequently opened. The Waste Transfer Station (an installation with none of the quality of design which Veolia promised and described by The Brighton Society as "basic metal sheds, the cheapest form of building") has never been able to contain odour during hot (&/or windy) weather conditions.

Veolia has not only been misleading the general public about their skills in odour management. I was shocked to read their claim in relation to the noise nuisances they have been causing us over four years.

Point 7.6 of their supporting statement for their current planning application reads: Notwithstanding these conclusions the facility will continue to be subject to the noise limits set by planning conditions and to be subject to control by the Environment Agency. Whilst there were some noise complaints shortly after the facility opened there have been no recorded incidents since 2010.

Both my wife and I complained separately to The Council's Environmental Health Officer during May 2013 about unreasonable industrial noise from Hollingdean Depot. It appears that our complaints do not get recorded unless we are willing to keep noise diaries and engage in bureaucratic procedures focusing on the very nuisances which we want to forget. I compiled a noise diary for them in 2009 over 7 days. I am not going to repeat this chore when I know that there is not a solution in sight.

Do the Council and The Environment Agency have any intention of taking complaints about Hollingdean Depot seriously?

Bunmi Aboaba told me that the Environment Agency sent staff to Round Hill when my partner and I both reported odour nuisance in June 2013 during the hot weather and the accompanying industrial action. They did not find any cause of concern.

My response to Bunmi was that I felt that the Environment Agency was not doing its job. I asked her if there was a higher body (one which scrutinised the Environment Agency's performance) which I could complain to.

Bunmi disclosed that there is an "ombudsman", but she was unable to give me his/her contact details. I would have to go through the complaints page on the Environment Agency's website to set such scrutiny in motion.

The legality of the monitoring systems used by both The Environment Agency and The Council may well be worth testing through appealing to a higher body or through legal challenge because both are "complaint-led".

In relation to the Council, they are hardly doing independent monitoring of noise since they are Veolia's main client who commissioned the use of the poorly located Hollingdean Depot site. The Environment Agency should also be doing noise monitoring according to the terms of Veolia's "license to operate", but they have made a private arrangement with The Council to split the tasks of noise and odour monitoring. By using procedures which are "complaint-led" both bodies have abdicated their responsibilities and burdened the victims of noise and odour nuisances with monitoring functions which really need to be done independently.

What is most distressing is they seem to have put residents off making legitimate complaints by devising over-complicated systems which build on doubting our credibility. Any resident who is brave enough to try out these defective systems can complain about noise nuisance from the Hollingdean Depot site by phoning Brighton and Hove City Council (01273 294490). Complaints about odour should be directed to The Environment Agency (phone 0800 807060). If they ask you to rate the odour nuisance on a scale of 1 to 6, tell them that you are contacting them because the level of odour is unreasonable and warrants complaint. Do not get caught up in their complaint minimisation systems.
Ted

16 July 2013 - Countering the assertions that noise and odour nuisances at Hollingdean Depot are not problematic.



I do not believe it would be wise to make "whether the community is behind the communal recycling expansion" the central theme of the campaign against planning Application BH2013/02219.

Few people oppose recycling expansion and there will be different opinions about methods and systems for collecting recyclables, probably according to where people live &/or their political affiliations.

What Application BH2013/02219 proposes is: to remove almost entirely the planning conditions put in place to protect the amenity of residents living near Hollingdean Depot. It is these conditions limiting operation at weekends and Bank Holidays which give us periods of respite from industrial noise, even if rubbish stored over a long Bank Holiday weekend can still cause odour nuisance when delivery/handling/collecting are restricted. To defend these conditions - the most precious concessions won when over 20,000 residents objected to permission for the WTS and MRF being granted in 2006 - we need to counter Veolia's assertions that odour and noise nuisances are not problematic since they draw a insignificant number of complaints from immediate residents.

Many members of Brighton and Hove's general public, perhaps also members of the planning committee who will determine the outcome of Veolia's 24/7 application, will believe what they have read in The Argus - i.e. that the problem of odour nuisance at Hollingdean Depot was solved once and for all in January 2013 in the context of a plan to use Ultra Violet rays to zap the odour particles.

I learnt for the first time yesterday that The Environment Agency considers the UV technology dangerous to use where there are people around, and has never allowed Veolia to use it. I also know very well that between 1st June 2013 and now, Princes Road residents have suffered objectionable odour which has marred their enjoyment of their gardens during a prolonged period of hot weather.

Both the general public and the people who will determine the outcome of Veolia's application need to be correctly informed. But Veolia's game is to misinform. In relation to industrial noise, they are trying to say that it won't make much difference to us if they operated 24/7 because the latter is not a problem to local residents. The evidence they quote in their supporting document is:

"Whilst there were some noise complaints shortly after the facility opened there have been no recorded incidents since 2010."

A key part of a campaign opposing Application BH2013/02219 must be to refute Veolia's misinformation or the picture they are trying to paint of "neighbours not bothered by their operation".

It would be easy enough for a few campaigners to collect evidence from every resident in Princes Road (perhaps some in Mayo Road and parts of Richmond Road too) on whether they have been bothered by Veolia's industrial noise within the last three years. If The Council's Environmental Health Officer is unwilling to record our complaints about unreasonable noise from the Dump (without making us compile 7-day diaries and produce detailed descriptions of nuisances we are sick of), then perhaps we should petition Hollingdean Depot's immediate neighbours ourselves and make our own records of the nuisances Veolia has been creating. It would be sufficient to limit the data to the last three months (if memories are short). We could present this evidence directly to members of the planning committee.

It should then become apparent that residents are not complaining to The Council's Environmental Health Department (about noise nuisance) and to The Environment Agency (about odour escapes) because they have no confidence that any effective action will be taken.

We all know that Hollingdean Depot is in the wrong place. Cllr Pete West concedes that it should never have been built. We all know that recyclables and black bag domestic waste need to leave our homes and be taken somewhere. But if the people who decide the Dump's operating hours remain under the impression that we are happy with the levels of odour and industrial noise and The Argus (prompted by Veolia) informs the general public that all is well, the mean yet key concessions (Part Saturdays, Sundays & Bank Holidays and Mon to Fri closing at 18.30 & 19.00), won by 2,175 objections in 2006, will be lost in 2013.

It would be a pity to be sidetracked by any other issues than the need for the protections we are trying to defend in fighting Veolia's current application. However, a related injustice worth highlighting would be the complaint-led procedures being used to monitor noise & odour nuisances. The nuisance monitoring should be done independently and not by the victims of the pollution.

Complaints are likely to remain few while residents know

- (1) they will be required to jump through several hoops before complaints are recorded and
- (2) complaints cannot be acted upon anyway, because the generic problem is the unsuitable location of the dump.

Ted

17 July 2013 Correction and selective leafletting campaign

In my message to the Group last night, I slipped up by adding a zero to the number of residents who objected to Veolia's Application BH2006/000900, which located the Waste Transfer Station and Materials Recovery on the unsuitable Hollingdean Depot site in the first place.

2,175 letters of objection were recorded in the PLANS LIST and on the 19th June 2006 at the planning committee meeting a further 89 letters of objection were added to this total.

2,000+ still represents a vast number of objections to a planning application. It equates with the entire population of Round Hill, though objectors were mainly scattered around several neighbourhoods near Hollingdean Depot.

Luckily, the PLANS LIST (19th June 2006) included the postal addresses of all 2,175 residents who originally objected primarily to the Dump's location. This gives us a lot of good addresses to use for selective leafletting in our July 2013 campaign to save the protections for local residents (against unwanted noise/dust/HGV movements by limiting operating hours) which The Dump The Dump campaign won in June 2006. I still have a copy of that PLANS LIST. What is needed now is help making a CONCISE (!) flyer.

Ted

17 July 2013 Caveats to use of the Council's complaint system

Good thoughts, Steve. For the record, Princes Road residents HAVE used the Council's complaint system. I submitted a noise diary over 8 days during the first year of operation of Veolia's WTS & MRF.

Marigold, whose home is on the south side of Princes Road, submitted a diary covering odour nuisance which often pervades the whole street during periods of hot weather.

I have always encouraged other residents to complain, but having made further complaints to The Council's Senior Environmental Health Officer about noise as well as to the Environment Agency about odour, I sense that these split reporting systems have been put in place in an attempt both to minimise and discourage complaints.

Before the Council's Senior Environmental Health Officer will formally investigate whether or not there is a statutory noise nuisance, he now requires us to keep a diary for a 2-week period.

Effectively he is requiring residents to do the equivalent groundwork to take out their own private legal action to abate a noise nuisance. He has even sent us a document on how to do this, which I have reproduced at http://www.roundhill.org.uk/main.php?sec=planning&p=PRIVATE_ACTION_TO_ABATE_A_NOISE_NUISANCE

The process is not without cost for individuals to pursue and the document also contains a caveat: "Brighton & Hove City Council cannot be held responsible for any outcome where private action is pursued." This suggests that if the legal action is unsuccessful, the victims of Veolia's pollution would also be liable to pay magistrates court costs.

You are right, Steve. We should continue to report the nuisances to The Council and The Environment Agency, as we have been doing in our household.

However, residents who have already submitted noise and odour diaries have lost confidence in The Council's ability to solve the problems of Hollingdean Depot. We know full well that the generic problem is that the Dump (for which Brighton and Hove City Council is the main client) is too near our homes and gardens. The system their Environmental Health Department is using to respond to known nuisances seems deliberately devised to discourage complaints.

Perhaps we have reached the stage where we should take action as a community in spite of The Council (strapped for funds and Veolia's main client). We would risk legal costs, but the process given to us at http://www.roundhill.org.uk/main.php?sec=planning&p=PRIVATE_ACTION_TO_ABATE_A_NOISE_NUISANCE does not need the Council's help.

I think that a legal challenge could also be aimed at the private arrangement agreed between The Council's Environmental Health Department and The Environment Agency to split the reporting of noise and odour nuisances respectively.

Of the Council, I would say that their Environmental Health Department was among those which gave the OK to the Hollingdean Depot location for the Dump when Veolia's permissions were granted in 2006 at a special planning committee meeting by a single casting vote. The Council should not be the only authorised body receiving complaints about noise nuisances from Hollingdean Depot. They have a statutory duty to respond to all types of noise nuisance in the city, but both Veolia's pollution and location are in truth of The Council's own making. The monitoring of industrial noise nuisance needs to be truly independent.

Of The Environment Agency, I have told them already that I feel they are not doing their job. It is they who grant Veolia a " licence to operate" and the terms of that licence covers NOISE as well as nuisances from odour and dust (fugitive particles). What is the legality of the private arrangement they have made with Brighton and Hove City Council (Veolia's main client) to allow a Local Authority with a direct interest in The Hollingdean Depot site to be the sole authorised body responding to complaints about noise nuisance?

As a community, we need to collect our own residents' statements on the nuisances we have been subjected to from Veolia since early 2009 to this date. Moreover, there is a need to challenge the systems which have been put in place to split up & minimise complaints, hoping that they will go away as community-minded residents are encouraged to move out of Round Hill and new residents are told "you chose to make your home near a Dump so just put up with it".

Ted

25 July 2013 - Elevating the problems experienced by residents living near Hollingdean Depot to central government, the EU or the World Health Organisation.

In his recent post on the nuisances to residents living near Hollingdean Depot (industrial noise /odour / dust pollution), Steve specifies a useful course of action:

"If the local authority cannot provide protection, the local community can elevate the issue to central government, the EU and the WHO"

I should like to invite members of The Round Hill Community Yahoo Group (please copy the link to neighbours and local friends) to view and hopefully sign a petition, which does partly as Steve suggests:

Downsizing Veolia's operation at Hollingdean Depot and the nuisances caused

<http://www.gopetition.com/petitions/downsizing-veolias-operation-at-hollingdean-depot-and-the-nuisances-caused.html>

Veolia's proposal to operate The Waste Transfer Station and Materials Recovery Facility for up to 15 hours a day for 363 days of the year is really instigated by Brighton and Hove City Council, yet it is The Council which will also decide the outcome of the planning application.

The proposal is to do away with the planning conditions which reasonably limit operating hours at Hollingdean Depot, effectively abandoning the planning policies (QD27 Protection of amenity and SU10 Noise nuisance) put in place to protect local residents.

Councils are responsible for both good and bad. However, on the issue of the regulation of Hollingdean Depot, we cannot have much confidence in a Council which has instigated such disregard for people living to the north of Round Hill, in Ditchling Road, and to the south of Hollingdean.

Please at least view the petition at <http://www.gopetition.com/petitions/downsizing-veolias-operation-at-hollingdean-depot-and-the-nuisances-caused.html>

which I intend to present to The Environment Agency and The Parliamentary & Health Service Ombudsman (via our local MP).

I would suggest signing the petition, not as an alternative to objecting against planning application BH2013/02219, but as an extra safeguard in case The Council merely ignores objections, as it did in 2006 when 2,244 residents' objections were ignored and permission for low quality installations in an unsuitable location was originally granted.

If you are affected by nuisances from Hollingdean Depot, it would be useful to say so in the comment field of the petition. Point 7.6 of Veolia's supporting statement for planning application BH2013/02219 observes that there have not been any recorded complaints about noise from Hollingdean Depot since 2010 and suggests that problems were confined to the first year of operation in 2009. It would be good if the petition could present a true picture of how "known nuisances" have affected those living near to The Waste Transfer Station and The Materials Recovery Facility from 2009 to this day.

I would stress the importance of offering The Council feedback on planning application BH2013/02219 itself. You can do this on The Council's website at

http://ww3.brighton-hove.gov.uk/index.cfm?request=c1199915&action=showDetail&application_number=BH2013%2F02219

The cut-off date for the Council's formal consultation on BH2013/02219 is Tuesday 30th July 2013, though comments received afterwards and by Friday noon (before the planning committee meeting deciding the outcome) are usually added to a late list.

Ted

26 July 2013 –“Our support for recycling is not at any cost”. Downsizing the Dump

Belief in the desirability of increasing recycling levels should be welcomed. But on the issue of waste management, I remember well some of the literature used by The Green Party to reject Hollingdean Depot as a suitable location for the Dump when canvassing for our support in 2006:

Six good reasons why the Green Party believe the Hollingdean Waste transfer Station & MRF must be rejected.

Among these reasons were 1) traffic, 2) air quality , 3) noise. 4) visual impact. The opening text reads:

"Of course the Green Party's in favour of recycling more of our waste....However our support for recycling is not at any cost, and we believe the community around Hollingdean Depot are simply being asked to put up with too much. City recycling should be handled at a number of smaller sites, not one big one...."

Residents troubled by nuisances from Hollingdean Depot are (now in 2013) are puzzled as to why the current proposal is to remove the planning conditions put in place in 2006 in accordance with Local Plan policies such as QD27 (Protection of amenity) and SU10 (Noise nuisance). The existing restrictions on MRF & WTS operating hours only give us a bare minimum of respite from industrial noise. Why isn't The Council downsizing the unsuitably located and poorly built Hollingdean Depot and creating smaller sites, including ones well away from people's homes for processing food waste and for noisy glass-tipping?

30th July 2013 - Veolia's proposal: one of the quickest dashes from formal consultation to planning that I have known

STOP PRESS: Veolia's planning application will be presented before the 7th August Planning Committee, so any late comments must be made before this Friday noon 2nd August 2013. This is one of the quickest dashes (from formal public consultation period to planning committee meeting) that I have ever known.

Please don't lose your opportunity to comment.

Go to <http://www.roundhill.org.uk> for further info

or play a part in the planning process by commenting as soon as possible at:

[http://www3.brighton-hove.gov.uk/index.cfm?](http://www3.brighton-hove.gov.uk/index.cfm?request=c1199915&action=showDetail&application_number=BH2013%2F02219)

[request=c1199915&action=showDetail&application_number=BH2013%2F02219](http://www3.brighton-hove.gov.uk/index.cfm?request=c1199915&action=showDetail&application_number=BH2013%2F02219)

Every objection will reduce the chances of longer operating hours & weekend & bank holiday opening of The Waste Transfer Station and Materials Recovery Facility being approved. The elected councillors on the planning committee will make the decision. It could be won or lost by a single vote.

Ted



30th July 2013 - The Council officers' recommendation is "TO GRANT" Veolia's application, but they have barely had time to read our objections!

Simon asks "Do we know how many objections so far?"

See The Plans List (first time I have seen a PLANS LIST already written up on the final day of a public consultation!)

5.1 records 18 letters of objection. My own objection, timed to arrive on the last day of the consultation (Tue 30th July 2013) was not included, so my own objections have NOT been put before the elected Councillors in The Plans List .

5.2 The Environment Agency (the government organisation which grants Veolia its "license to operate") has made no comment. The Council does not seem very interested in our letters of objection. It seems that the various Council departments had got their reports ready even before the final day (TODAY!) of the public consultation.

5.3 The Council's own Environmental Health Department writes several paragraphs in support of the proposal. I am not convinced that this was done after reading our objections. Great play is made of the professional assessments and surveys which Veolia has presented. I am familiar with these documents and my own judgement is that they are not at all robust and should not stand up to scrutiny from truly independent bodies.

5.18 The Sustainable Transport Department writes:

"The proposals do not involve any change to the permitted tonnage at the facility (BH2011/03179 Condition 1) or the overall number of vehicles. Condition 1 of BH2011/03179 states that that the unit has a capacity of a maximum of 160,000 tonnes per annum. This effectively controls the vehicle numbers allowed per annum and the vehicle numbers associated with the development have already been set. These proposals do not alter this maximum permitted tonnage."

My own comment [RE WHAT IS REALLY EXTRA PROVISION FOR HGV MOVEMENTS]:
The Council's Sustainable Transport Department omits to mention that Hollingdean Depot can receive domestic waste and recyclables from other towns & cities - not all is from Brighton and Hove homes and that the maximum capacity of 160,000 tonnes per annum has never been reached.

Therefore, longer operating hours (15 hours per day instead of 12 and 7 days per week instead of 5) will clearly facilitate MORE processing of waste at Hollingdean Depot. The application facilitates a BIGGER OPERATION together with WEEKEND & BANK HOLIDAY WORKING.

In summary, the Council officers' recommendation is "TO GRANT" Veolia's application, but they have barely had time to read our objections! I am more than a little disappointed at the fastest dash from public consultation period to planning committee meeting that I have ever known in any Local Authority.

31 July 2013 - Noise impact assessment by no means robust. It omits any measurement of noise over the 25-27 May 2013 Bank Holiday when Hollingdean Depot was operating and the noise was atrocious

"Vivien" wrote: I also submitted my objection yesterday. Haven't checked to see if it's on the list.

Vivien - no letter of representation from your street and only 6 from Princes Road (our own objections are not among them!) have been listed on the Plans List, clearly drawn up before the formal public consultation was even over. This does not say much for community engagement, which is what Local Authorities are meant to do.

I do not think that we should accept reassurance that our objections will be added to the "late list" (a list of Additional Representations which will we will see in The Town Hall on the day of the Planning Committee). The elected members of that committee who will decide Veolia's proposal will have a lot of other applications to consider. The whole point of publishing THE PLANS LIST over one week before the date of the planning committee meeting, is to give them time to absorb the arguments on BOTH sides.

The Councillors on the Planning Committee (7 Aug 2013 2pm Council Chamber Hove Town Hall) who will decide Veolia's application are Councillors MacCaffery (Chair), Jones (Deputy Chair), Hyde (Opposition Spokesperson), Carden (Opposition Spokesperson), Cox, Davey (Councillor for our ward), Gilbey, Hamilton, Littman, Theobald, Wells and Wakefield.

Their contact details are at:

<http://present.brighton-hove.gov.uk/mgCommitteeMailingList.aspx?EM=1&ID=118>

Now is the time for residents to lobby them on the following

- the insufficient time we have had to raise objections to application BH2013/02219. The proposal needs to be allocated to a later meeting so that members of The Planning Committee can receive a new PLANS LIST which contains ALL OUR OBJECTIONS with sufficient time to consider them.
- the failure of the officers to make their own comments AFTER consideration of our objections
- the circular nature of "the case FOR BH2013/02219" whereby The Council's Environmental Health Department fails to record residents' complaints about industrial noise pollution, and thereby inputs into what he calls a robust NOISE IMPACT ASSESSMENT which concludes no statutory noise nuisance has been identified from the activities on site from current operation of the MRF & WTS Facilities.

The Council's Environmental Health Department clearly regards THE NOISE IMPACT ASSESSMENT (prepared for Veolia as recently as 3rd July 2013) as a robust document which makes the case for granting permission. Will there be time for both Council officers and members of The Planning Committee to review this key piece of evidence in the context of our objections i.e. after they have had time to read OUR evidence?

I doubt many of us have had time to look at the evidence in favour of operating Hollingdean Depot practically continuously throughout the year.

The NOISE IMPACT ASSESSMENT (51-page PDF) is at [http://wam.brighton-hove.gov.uk/PlanningWAM/doc/Supporting%20Document\(s\)-2684780.pdf?extension=.pdf&id=2684780&location=VOLUME3&contentType=application/pdf&pageCount=1](http://wam.brighton-hove.gov.uk/PlanningWAM/doc/Supporting%20Document(s)-2684780.pdf?extension=.pdf&id=2684780&location=VOLUME3&contentType=application/pdf&pageCount=1)

Veolia has gone to an acoustics expert based in Winchester/London/Exeter to make both measurements and judgements in relation to the noise nuisances experienced by residents living around their facilities. You would think that a Council (which asks us whether we want skateboard-ramps located to the N or S part of The Level) could send survey documents around a street or two to gauge for itself the impact of a very unpleasant cocktail of industrial noise (northern Round Hill) and HGV movements (south of Hollingdean) on residents' amenity.

Instead The Council's Environmental Health Department gives credibility to a report by professionals who do not suffer the nuisances. How robust then is the professional document.

The very first paragraph 1.1 betrays the regard which this document (prepared for Veolia!) shows local residents.

The Hollingdean Materials Recovery Facility (MRF) & Waste Transfer Station (WTS) site in Brighton is located in close proximity to neighbouring residents, albeit on a site, with a previous use as an abattoir and next to a meat market and council depot site, with a railway line to the rear.

Perhaps in the production of their robust NOISE IMPACT ASSESSMENT, the professionals could have asked local residents whether we actually object to noise (of limited duration) from trains. I am only aware of an issue RE train horns in the approach to the tunnel which was resolved several years ago. Are any residents still objecting to noise from an abattoir which was shut down in the 1980s?

I do recall that the intensification of Hollingdean Depot drew complaints from local residents in the years before Veolia's installations were built. Noise from the Council's City Clean depot site (to the N of Hollingdean Lane!) was at the heart of these complaints from Princes Road residents. This Council-owned facility has disrupted our lives too, but to a far lesser extent than the WTS and the MRF.

I would hope that our political representatives would query arguments which use both historical and existing nuisances to justify extra disruption to our lives. The planning conditions put in place in 2006 to limit operating hours at Hollingdean Depot were in accordance with Local Plan policies SU10 Noise Nuisance, QD27 Protection of Amenity as well as General amenity considerations within points 8.4 to 8.9 of the East Sussex and Brighton & Hove Waste Local Plan. These protections are also part of planning history in our area. They have not proved adequate protections, so what is the argument for removing them now?

Why does the professional NOISE IMPACT ASSESSMENT come out in favour of removing these protections in the context of (what it represents as) an ALREADY NOISY ENVIRONMENT?

If our political representatives are really interested in local democracy and community involvement, then they need to be aware of the CIRCULAR ARGUMENT contained in the concluding paragraph 7.2 of the NOISE IMPACT ASSESSMENT:

7.2 It is clear from historic evidence provided by BHCC that under the provisions of the Environmental Protection Act 1990, no statutory noise nuisance has been identified from the activities on site from current operation of the MRF & WTS Facilities.

Historical evidence provided by BHCC" is a pompous phrase alluding to evidence provided by Brighton and Hove City Council's own Environmental Health Department.

The latter department refuses to record residents complaints about noise nuisance from Hollingdean Depot unless we are willing to keep a 2-week diary (although I have completed an 8-day diary for them previously) and are prepared to take the complaint to a Magistrates Court, being responsible for the court costs should the case be judged in Veolia's favour.

During the 25-27 May 2013 Bank Holiday weekend, industrial noise from Hollingdean Depot reached an atrocious pitch and absolutely ruined our time in the garden. We retreated indoors and contacted The Council's Environmental Health Department. Veolia was able to operate over some of this Bank Holiday weekend because it had special permission for catch-up. They argued that the noisy glass-tipping they were doing on Bank Holiday Monday 27th May was permitted since they were merely moving glass within the site and not taking delivery of it. The racket they were creating ruined our enjoyment of our garden all the same.

Proposal BH2013/02219 seeks to permit weekend and Bank Holiday working over periods of up to 15 hours per day. It is curious that the professional NOISE IMPACT ASSESSMENT conveniently omits any measurement of noise over the 25-27 May 2013 Bank Holiday when Hollingdean Depot was operating and the noise was atrocious.

The document' data is does not satisfy a proposal to operate on Bank Holidays. 14 out of the 20 sound recording periods are confined to days between 7th March and 3rd April 2013 when weather conditions hardly invited outdoor leisure. Only the last two days of May were used for sound recordings missing both May Bank Holidays.

The first five days of June complete this selective assessment, though June and July were hot months where odour escapes from Hollingdean Depot became the major nuisance. The Council has made a private arrangement with The Environment Agency to split the reporting of "noise" and "odour" nuisances. The full picture of what residents have to endure therefore depends on these departments' willingness to liaise with each other. After all the industrial noise pollution we have had to endure from Hollingdean Depot, I am astonished that under evidence provided by BHCC that under the provisions of the Environmental Protection Act 1990, no statutory noise nuisance has been identified from the activities on site from current operation of the MRF & WTS Facilities.

In THE PLANS LIST, the Council's environmental health department finds the NOISE IMPACT ASSESSMENT offered by Veolia as robust. This is not at all surprising. To find the survey "less than robust" would be to doubt their own contribution to this NOISE IMPACT ASSESSMENT.

I am afraid that the NOISE IMPACT ASSESSMENT stinks.

It fails to consider that the quality of noises (banging, rumbling, echoing, clanging, beeping) which we get for LONG periods (not like a train) and on a REGULAR basis, is very different from the quality of other noises around which are normally of much shorter durations.

It acknowledges in 2.1.4 that not all the vehicles using Hollingdean Depot yard have 'white noise' smart reversing alarms - vehicles from outside of Brighton and Hove and from companies other than Veolia are permitted to use the yard . It should follow from this acknowledgement that extending the operating hours by so much more creates potential for more vehicles from outside our city to use Hollingdean Depot.

The Council's Sustainable Transport Department argues in THE PLANS LIST that the units maximum capacity of 160,00 tonnes per annum effectively controls the vehicle numbers allowed per annum and that Veolia's application does not change the maximum permitted tonnage. Hollingdean Depot has never been operating at its maximum permitted tonnage. Its current level of operation causes an intolerable level of nuisance to residents living nearby. Application BH2013/02219 creates potential for even more nuisance . Both the bulleted points above are absent from the objections recorded in the premature PLANS LIST.

Ted

4 August 2013 - Dash to planning: the Plans List contains a mere 18 objections. The Late List contains a further 45 objections.

The Plans List for the meeting at 2pm Council Chambers Hove Town Hall on Wed 7th August 2013 to decide Veolia's proposal (to operate the WTS and MRF at Hollingdean Depot for much longer hours) contains a mere 18 objections. The formal public consultation ended on Tue 30th July 2013.

I have now received (from an elected Councillor) a copy of "the late list", which records a further 45 objections. The deadline for late representations closed at 12 noon on Friday 2nd August 2013. I assume that objections received after Friday have been discarded even though the progress of Veolia's application has been extraordinarily rushed. It concerns me that I have not managed to find "the late list" on The Council website, though Press and public wishing to review the arguments (without really being adequately updated!) can find The Plans List. I feel that The Council Officers have not taken a balanced approach with Veolia's application.

Some of the objections included in "the late list", including one from my own household, were actually submitted before Tuesday 30th July 2013. These should have been recorded on The Plans List to give members of the planning committee more time to absorb them. A second objection from my household (either my own or my wife's), also submitted before Tuesday 30th July 2013, has not been recorded at all either in The Plans List or "the late list".

It would appear that The Plans List was completed BEFORE the last day of the formal public consultation and the process of logging the objections has suffered from rushing Veolia's proposal to planning committee stage.

The Council's Environmental Health and Sustainable Transport departments could not have added their own comments in the context of our objections. I would have expected many of the objections from Round Hill related to the issue of environmental health, as residents living in the north of our conservation area experience noise pollution nearly every day and odour pollution during periods of hot weather. All we are asking for in relation to Veolia's proposal, is for operating hours neither to be increased to 15 hours per day nor to cover weekends and Bank Holidays. This request has not been given any weight by Environmental Health, though it remains important to us to have periods of respite from industrial noise.

Hollingdean residents' requests for current protections (from operating the WTS & MRF at weekends) to be continued, focus on both transport and environmental health issues: i.e. the volume of Heavy Goods Vehicle Movements within streets which form part of an Air Quality Management Area. The Council's Sustainable Transport department treat these requests as irrelevant. They argue that while the maximum permitted annual throughput (in tonnes) for The WTS and MRF has not been reached, increasing operating hours by so much will not have significant effects on residents' amenity. While vehicles from outside our city are also permitted to use the facilities at Hollingdean Depot, it does not follow that this is the case. But more importantly, the request for there to be no more Heavy Goods Vehicles around at weekends and bank holidays than at present, goes completely unaddressed. If successful, Veolia's proposal will permit more HGV movements during periods when Hollingdean children are home from school, subjecting them to further air pollution, road safety risk and noise.

What we have in these departmental contributions are justifications for a totally unreasonable planning application. The environmental health and transport infrastructure of at least two residential areas have been completely side-lined in favour of growing further nuisances at a site which everybody knows is poorly located for managing waste - and waste which is not merely sourced from Brighton & Hove's own residents.

It is the job of Council officers to weigh up BOTH SIDES of planning proposals. On Veolia's application, they have been distracted by an end (community waste & recycling bins) which (while probably motivated by good intent) does not justify the means (the cost to the amenity of residents living near Hollingdean Depot).

Ted

7th August 2013- Questions for our M.P. Disappointment with the Environment Agency

Thank you, Annie, for this handy update. Missed the webcast of the Veolia item. While webcast remains in live mode, one cannot go back. However, the webcast will be archived later and then it will be possible to reference past parts of the meeting.

Interesting that Caroline Lucas our MP tried so hard to diffuse the sense of unfairness at how quickly this has been pushed to planning committee stage. She probably recalls that two political issues were greatly influential in boosting her party's support within local elections as well as winning her a seat in parliament:

1. [2003] The Iraq War 2003 and

2. [2003] The awarding of the 25-year contract to Veolia and [2006] the siting of their facilities at Hollingdean Depot. Note that it does not follow from Veolia's success in winning the 2003 contract that its facilities for Brighton and Hove have to continue to be located in ONE unsuitable location. Hollingdean Depot could still be downsized and other locations found for food waste and glass processing.

Given our MP's stance on environmental issues, she ought to support what we are calling for in our request for Hollingdean Depot to be downsized: i.e. better arrangements for using food waste, rather than it being mixed with miscellaneous black bag waste so near to people's homes.

- Is she in favour of food waste collections and anaerobic digestion at a dedicated plant (as considered by DEFRA to be the most sustainable option if food waste already exists) or not?
- Would she like to see Hollingdean Depot upsized or downsized?

These are questions which local residents may like to ask her.

The hope then is to get The Environment Agency to assume its correct brief of dealing with ALL forms of complaint about operation at Hollingdean Depot (i.e. industrial noise as well as odour escapes). Veolia's "license to operate" is granted, NOT by The Council, but by The Environment Agency. This license limits them to levels of pollution (whether noise, odour, or dust) which staff from The Environment Agency judge to be reasonable.

Two major points which The Council's summary of our objections failed to emphasise are

(1) the unpleasant quality of the noise nuisance, which cannot be compared with the noise of a passing train or neighbours playing music, as done in professional Noise Assessments which measure decibels

(2) the long duration of what is an objectionable mix of industrial noises i.e. the possibility of it continuing for 15 hours a day 363 days a year; all we are asking is some periods of respite from this unwanted orchestra.

The lame summary in The Plans List does not make these points clearly, and therefore fails to capture the essence of our objections.

The Environment Agency should therefore set reasonable limits for operating hours. If the EA refuses to do this, it will lose a lot of credibility throughout the UK. The Round Hill Society's own logging of nuisances from Hollingdean Depot on our website in 2009, was actually quoted in a Public Enquiry when Veolia wanted to locate a Waste Transfer Station near Edinburgh. In this planning application, Veolia was unsuccessful. The residents won the Public Enquiry!

Any opponents of future applications from Veolia for new Waste Transfer Stations in any UK locations near to homes & gardens, will be able to quote the Round Hill / Hollingdean/ Ditchling Rd / example:

in relation to our neighbourhoods, the Environment Agency is presenting itself as "a lame duck" by allowing political & commercial purposes to come before the rights of residents

to enjoy reasonable environmental conditions. This leads to the question: what is The Environment Agency for? Allow Veolia in, and your local environment will not be protected even by The Environment Agency.

It will be interesting to see if The Environment Agency will get involved with setting limits on operating hours. What if Veolia wanted to operate throughout the night? In a sense, the latter might be better than having them operate for up to 15 hours during the day when we want to use our gardens or entertain visitors. The idea of the petition is to put the squeeze on the Environment Agency and probe a little as to whether they are representing residents' interests AT ALL in relation to Hollingdean Depot.

I hope to see an end the private arrangement which allows the Council (instead of The Environment Agency who have relinquished their role RE the operating license) to field residents' complaints about nuisance from noise. As Veolia's main client, the Council has a direct interest in minimizing and shelving our complaints: that is exactly what The Council's Environmental Health Department is up to when it says that there have been no recorded complaints about noise since 2010. The latter is only true because The Council refuses to act on complaints unless the victims of pollution are willing to risk the cost of losing a noise abatement action in a magistrates court.

Ted

8 August 2013 - Actually a total of 103 objections to Veolia's proposals, whereas The Plans List (i.e. the officers' advice to the planning committee) was based on just 18 objections.

I have posted what I know about the votes of planning committee members at <http://www.roundhill.org.uk>

None of our ward councillors was on the planning committee that day. There were some substitutions.

I was interested to learn (only by watching the webcast) that there were actually 103 objections to Veolia's proposal. Just 18 objections were recorded on The Plans List. 45 made it to "the late list". The Council also acknowledged that a further 40 objections were received between the deadline for "the late list" and the day of the planning committee meeting.

All the hallmarks of a rushed lead-up to planning committee stage. Yet Veolia's proposal to operate their WTS & MRF 15 hours a day for 363 days of the year still scraped through:
IN FAVOUR: 5; AGAINST 4; ABSTENTIONS 3
The Plans List summary of our objections was merely based on 18 of them, which is what Brighton and Hove News is still saying we got.

The Case Officer's summary of our objections (13 simple bullet points averaging 10 words each) was very lame to say the least. We have to trust the Case Officer to make a fair summary, since this is the only part of our objections members of the planning committee normally see unless we lobby them directly.

It would have been much fairer, Simon, if The Council had just documented the 8 bullet points on your flyer, which at least contained some logical threads. Of course, the Council departments, writing in support of Veolia's proposal, were permitted paragraphs of text including complex sentences and logical connectors. Their license to use prose did not alter the poor evidence base for supporting the application. They praised the use of professional consultants to offer Noise Assessments. However, all noise monitoring was external. There was no acoustic data collected by recording from within residents' homes and gardens.

On the Round Hill Society website, I compare the 13 bullet points used by The Council to present our arguments with the 8 effective bullet points on your flyer.

Conclusion: the officers have not probed into Veolia's acoustic data and the Case Officer has not captured the quality of our objections in his own summary of them.

TED

11 September 2013 - Rush to commence construction in Ashdown Road

Thank you, Robin, for this informative update.

One thing which may be helpful is that the planning permission for application number: BH2008/02170 [2 Ashdown Road] was granted on 6th October 2010 (more recently than 2009)

Interestingly, which may explain the rush to commence construction in October, this planning permission is due to run out on 6th October 2013.

This explains the eagerness of the current developer (Carr Developers of Eastbourne) to avoid having to apply to Brighton and Hove City Council for an extension of permission (taking a slight risk of refusal) by proceeding apace with construction.

If they indeed fail to commence before 6th October 2013, then Brighton and Hove residents would have a chance to persuade a differently constituted planning committee to refuse extending the permission. Note however that unless the planning context has changed (this would need to be our argument), extensions of permission are rarely refused. The Council (however sympathetic to existing residents) would not want to risk losing an appeal by the developer as rate-payers pick up the cost of lost appeals.

When you say that "the development of the rear yard plot / garden at 2 Ashdown Road continues apace" does this mean that they have commenced development of the two houses? I would have thought that this being the major part of application BH2008/02170 (expanding the developed footprint), the mere 'conversion of the existing house at 2 Ashdown Rd into 3 flats' would not count as commencing the permission given on 6th October 2010.

If Carr Developers meet the 6 October 2013 deadline for commencement, residents concerned about the standard of construction may find it useful to review the conditions accompanying the 6 October 2010 permission to check that they are fulfilled by the sub-contractors. I summarised these some time ago at

http://www.roundhill.org.uk/main.php?sec=planning&p=Ashdown_Road_Development

Ted

19th October 2013 - 2nd proposal to demolish Richmond House and replace it with a 138-room student hostel

See https://roundhill.org.uk/main.php?sec=archives&p=Richmond_House_2013_2nd_Proposal

Although the formal consultation period has passed, comments can still be made using Brighton and Hove City Council's Online comment form right up to Friday noon on 15th November 2013.

The proposal is scheduled to be decided by the planning committee at their meeting on Wed 20th November 2013.

Developers like to give the impression that they have consulted local communities and that residents are broadly happy with their proposals. Unless apathy rules in our neighbourhood, the number and quality of comments posted on the Council's Online comment form will reflect the truth.

We need to ask ourselves specifically if the developer has answered the following questions to our satisfaction:

1. Has it been made clear how massive the building would be? Would a construction of this size effectively delete D'Aubigny Road from the conservation area in terms of character / appearance / period-feel?
2. Has it been made clear who the occupants will actually be both during term-times and during holiday periods?
3. Is there a grain of truth in the argument that the development would take pressure off the demand for Houses of Multiple Occupation?
4. Would noise breakout be within tolerable limits?
5. Is there a credible argument that the development would have social / educational / economic benefits? if so, to whom would they accrue?

I've commented on these areas on The Round Hill Society's website at <http://www.roundhill.org.uk> where I have also posted a report on last Thursday's Annual General Meeting where we elected a new committee (we now have 13 committee members).

In order to ensure that the developer does not "speak for us" we need to ensure that as many residents as possible have commented on this (their second) Richmond House application. Each application needs its own separate comments. Objections to the first do not carry over to the second.

Any info which residents can share within this group on what I believe to be "unanswered questions" (where misleading impressions may prevail even in the minds of people who may make the decision) would be most helpful now. We are less than a month away from the outcome of something which could both have a major adverse effect on our conservation area and badly compromise the intended purposes of The Centenary Industrial Estate.

The purpose of the proposed Richmond House development has received such little discussion and remains so poorly defined that I am convinced that it does not appear to have been thought through. The developer seems desperate to erect a massive building with over five times the internal floorspace of the current Richmond House without sufficient consideration to who is going to occupy it (their identity, their purposes and their welfare). If the vague concept of "housing so many 16-18 year old learners from overseas in a single five-storey building" became a reality (which I doubt!), it could undermine the host family EFL sector in our city which shares economic benefits among a large number of families as well as contributing far better to international understanding and the purpose of learning English. If it ever gets built, I don't believe that the stated use (which they don't seem to want to pin down) would last. What would we be left with? Who would occupy it?

Ted

20th October 2013 - Does BHCC have any planning brief which encourages residential development on an industrial estate?

It would be good to find out from The Case Officer whether Brighton and Hove City Council has any planning brief whatsoever which encourages residential development on the Centenary Industrial Estate.

All the information I have been able to uncover suggests not.

There is a more recent study than the 2006 one:

EMPLOYMENT LAND STUDY 2012 (Final Report December 2012) prepared for BHCC by Nathaniel Lichfield & Partners (Planning, Design, Economics)

Appendix reference 3079713v3 (printer p173) of this document focuses exclusively on The Centenary Industrial Estate and states:

"The existing Local Plan protects the site employment use only (EM1 - industry and business)."

"The Draft City Plan will continue to protect the site for B1 (business), B2 (general industrial) and B8 (storage & distribution) uses. Potential uses: B1c/B2/B8. " See Use Classes Order.

See also within same document P42-43 (printer page range 58-59) on Safeguarded Sites i.e. primary industrial estates and business parks for B1, B2 and B8 uses as well as P57 (printer p75) which features The Centenary Industrial Estate within a table of industrial sites, gives it a score of 24 out of 30, defines it as a Safeguarded Site for B1c, B2, B8 potential uses.

The 2006 document (quoted to Annie) adds weight to the conclusions of the 2012 study: EMPLOYMENT LAND STUDY 2006 prepared by Roger Tym & Partners (Planners and Development Economists) also supports the designation of the Centenary Industrial Estate for employment (business & industrial uses only).

Paragraph 6.22 of the 2006 study (pages 58-59) states that:

"As a relatively modern estate with no vacancies, the site is fully used and no redevelopment or change of use could be considered appropriate in the short or medium terms."

I find it puzzling that The Richmond House developer has invested so much in two proposals which are non-starters unless Brighton and Hove City Council has changed their policy and is willing to ignore a land study performed as recently as December 2012. The latter confirms that the policy which has always limited the uses of The Centenary Industrial Estate to "business" and "industrial" still applies and is indeed part of the Draft City Plan. Residential development is deemed inappropriate on this site which has been safeguarded for its existing uses.

Moreover, the existing Supplementary Planning Document, relating to parking on business and industrial sites would preclude the sort of vehicle use which servicing a large residential development would entail. E.G. Collections of domestic waste, taxis collecting and dropping off at the mouth of the lorry/van service road to Lewes Rd Sainsbury.

Does anybody know of any U-turns in Brighton and Hove City Council's approach to business parks and industrial estates which are yet to appear in planning briefs and Draft City Plan policies? Has anybody managed to glean any change in approach from the Case Officer or the relevant Council departments?

Ted

10th November 2013 - Richmond House 138-room proposal recommended for refusal

Council Officers have recommended The Richmond House 138-room proposal for refusal, but the outcome will be decided by the politicians on the Council's planning committee at their meeting at Hove Town Hall on Wednesday 20th November 2013.

The Plans List, a public document containing the reasons for the Council's recommendation and a summary of the objections received to date, is expected soon on

The Council website. Now is the time to communicate directly with the elected Councillors on the planning committee. There is a prominent link to their contact details (including email addresses) on the Home Page of The Round Hill Society's website at <http://www.roundhill.org.uk>

The planning committee members have a lot to absorb with other planning applications on their agenda. It would probably be best to pick up ONE key point. There will be several points in The Plans List. I have also summarised at least 5 reasons for objection on The Round Hill website.

However, I suspect that most Round Hill residents have already defined their own main concern. Please take the time to pass it on directly to the decision-makers. They notice when they are contacted by a number of residents with genuine concerns and will pick up on areas of consensus.

Do let me know as soon as you see The Plans List online so that I can put a link to it from <http://www.roundhill.org.uk>

Ted

13 November 2013 - 102 letters of objection. 2nd Richmond House proposal refused)

Item A: Richmond House, Richmond Road, Brighton of The Plans List

- 1) containing the Council officers' reasons for recommending refusal and
- 2) summarising our objections to the proposal

is now on the Council's website.

Click here to access the full agenda of the planning committee meeting to take place at Hove Town Hall on Wednesday 20th November when elected members will decide the outcome of the application.

102 letters of comment have been received to date - all objecting to the proposal BH2013/02838

The url to access THE PLANS LIST is:

<http://present.brighton-hove.gov.uk/Published/C00000118/M00005023/AI00037300/ABH201302838RichmondHouseBrighton.pdf>

Ted

P.S. See The Round Hill Society's website for latest update.

<https://roundhill.org.uk/main.php?sec=archives&p=Richmond House 2013 2nd Proposal>

5th December 2013 - Comment on Carelet's proposal for even taller 3-storey houses

Dear residents,

The formal period for comment on Carelet's application BH2013/03782 (for 6 even taller three-storey houses to the rear of 67-81 Princes Road) ends tomorrow.

Please consider submitting even a short online comment. A minimum of 5 objections would mean that the decision was not delegated to officers and the planning committee would decide the outcome. This gives opportunity for further public representations.

To comment quickly online, go to:

[http://ww3.brighton-hove.gov.uk/index.cfm?](http://ww3.brighton-hove.gov.uk/index.cfm?request=c1199915&action=showDetail&APPLICATION_NUMBER=BH2013%2F03782)

[request=c1199915&action=showDetail&APPLICATION_NUMBER=BH2013%2F03782](http://ww3.brighton-hove.gov.uk/index.cfm?request=c1199915&action=showDetail&APPLICATION_NUMBER=BH2013%2F03782)

We all get worn out by developers who get permission (in this case twice) and then tell us that their successful proposals are no longer viable. I think that The Round Hill Society needs to let The Council know that this is not an acceptable argument on which to base a request for a larger amount of bulk.

The extra bulk is purely proposed to save them money on excavation. A large area of additional bulk would hide the green space which they pretend they are championing by asking for more building. Their design & access statement turns logic on its head.

I have posted on our website at <http://www.roundhill.org.uk> data to show that while presenting us with a 1.2 metre (approx 4ft) increase in height, the increase in height actually varies depending on which of their 6 proposed houses you are looking at. For house C, the increase is 1.46 M (over 4ft 9) and for house B it is 1.41 M (over 4ft 7) - increases on what is already three storeys, but dug into the hillside to address previous planning inspectors' concerns about overlooking & loss of privacy (relating especially to the living conditions of prospective residents who have the outlook of the Dump to worry about on the other side).

The appeal inspector who finally rejected Carelet's 2007 proposal for a mix of 8 two & three storey houses, did not feel that the Dump was a deciding factor on its own. But he stated that the combination of overdevelopment and the poor outlook provided by The Waste Transfer Station did give him cause to throw out the proposal because (contrary to policy QD27 of the Local Plan) it did not achieve acceptable living conditions for future occupants in relation to overlooking and loss of privacy.

Carelet's current application involves an increase in bulk (merely to save them the costs of excavation for an ill judged scheme) which would compromise both living conditions and views of the conservation area from the north (also mentioned in the appeal decision) once again.

No detail is submitted in the new application on the implications of extending the lift to accommodate bicycles (which should have been conditioned before permitting their last proposal). Will they take space from the areas behind the lift shaft allocated (at Princes Rd level) for rubbish and recycling and (at the bottom of the lift shaft) for bicycles? Will they remove landscaping features agreed in the previous scheme? There is no detailed sketch of the changes they propose.

I notice on the new plans that they sneak in an additional roof light on their most westerly house without highlighting any change in any of the written documents. You need to be an expert in 'spot the difference' to pick this up in the drawings.

I do hope that some residents will have time before the end of tomorrow to make a short online comment.

13 December 2013 - Concerns raised RE land between Belton Road and Crescent Road

Zoe

While it is good practice for developers to consult with immediate neighbours prior to putting in a planning application, this does not always happen. If you know who they are, you could ask them what they intend to do.

If they are adding to car parking capacity, they will need planning permission. The Council's planning register is at

<https://planningapps.brighton-hove.gov.uk/online-applications/>

Enter "Crescent Road" or "Belton Road" into the address field and you will see if any new applications are under consideration. I've just done this and can only find proposals relating to roof lights, windows and front doors. This suggests that they have not made a planning application yet. If/when they do, the people living around should receive a letter explaining the proposal and giving them 3 weeks to comment.

It is difficult to save trees unless they are already protected or unless you can make the case for a TPO (Tree Protection Order) in anticipation of a proposal to remove them. A collective approach to the arboriculture service from a group of immediate residents might stand more chance of getting the intended result.

Make a good case: check that the tree is a good specimen of its kind, not dying or too near a building. Factors such [1] visual amenity, [2] environmental benefits - wildlife/biodiversity [3] if the tree has a screening function (e.g. hiding an eyesore or preventing overlooking between houses) can be helpful. Does the tree assist in defining a boundary? Is it one of a valued group of trees? Find out if the tree is genuinely valued by neighbours. It is helpful if the tree can be seen from a public street, as this can then involve the Council's Conservation Advisory Group.

See

<http://www.brighton-hove.gov.uk/content/leisure-and-libraries/parks-and-green-spaces/tree-preservation-orders>

To find out which trees (if any) are protected on land between Crescent Road and Belton Road, email the Council's arboriculture service on arboriculture@...

Your security concerns would probably best be voiced in the context of a planning application, if one indeed follows. Valid areas of comment include whether a proposal is suitable for the area and whether access is safe.

Ted

