

Appendix 3 College Conservation Area Character Statement

Full list of of Consultation Responses

1	Source	Do you agree that the draft character statement has captured the special character and appearance of the CA	Comments on the extent of the conservation area	Other Comments
2	Resident	Agree	The eastern end of the industrial estate - could be improved - and should not be over developed. Likewise, the current bingo hall and its large carpark should need special consideration if ever developed.	
3	Resident	Strongly agree		
4	Resident	Agree		
5	Resident	Disagree	It should include more of the area to conserve their buildings such as those on Bell Vue Gardens and College Place too	
6	Resident	Neither		
7	Resident	Agree	I think the red brick buildings on Walpole and college terrace should be listed and cares for accordingly	
8	Resident	Agree		
9	Resident	Disagree	<p>1. Firstly it would help if you had numbered all the paragraphs, it makes the statement easier to comment on. Perhaps you might consider this a standard practice in future.</p> <p>2. At the outset, I would like to be clear that I have no reservations about the commercial operation of a private education establishment in this conservation area. In saying that the statement should recognise that the school is a commercial organisation and as such has an impact on the environment and the local community.</p> <p>3. The first three paragraphs could be much clearer, your main points are hidden and muddled, could I suggest it reads something like this:</p> <p style="text-align: center;">Purpose of Designation: The College Conservation Area has been designated for specific reasons, and the character statement aims to clarify and guide the preservation and enhancement of this area.</p> <p style="text-align: center;">Assistance and Guidance: The character statement serves as a resource to assist and guide various stakeholders involved in development and change within the conservation area. This includes developers, members of the public, investors, and planning authorities.</p>	

		<p>Assessing Development: The City Council will use the character statement as a tool to assess the design of development in future planning proposals within the conservation area. This means that when new development projects are proposed, they will be evaluated based on how well they align with the principles outlined in the character statement.</p> <p>Understanding Significance: The character statement helps people, including the public, investors, and planning authorities, to understand the significance of the historic elements within the conservation area. It emphasises the importance of preserving or enhancing the character and appearance of the area.</p> <p>Balancing Preservation and Development: While preservation and enhancement are important, the approach is more focused on control than prevention. The aim is to allow the conservation area to remain vibrant and prosperous while ensuring that any new development aligns with its unique architectural and historic character.</p> <p>Conservation Area Designation: Conservation areas are designated by local authorities or organisations like Historic England in consultation with relevant local stakeholders and amenity groups. These designations are made to protect areas of historic, architectural, and landscape significance.</p> <p>The character statement for the College Conservation Area serves as a guide to ensure that any future development within the area is carried out in a way that respects its historical and architectural heritage and contributes to its preservation and enhancement. It also emphasises the importance of striking a balance between preservation and development to maintain the area's vitality.</p> <p>4. Why is this statement being amended now? Does the Council have some concerns about the area not identified in the statement?</p> <p>5. Specifically, I raise the following issues with the statement.</p> <p>6. Para 1.2: There should be a desire to enhance the conservation area, this was materially affected by the building on the Science and Sports block on the Western border of the school. The statement should reflect this lack of continuity in the area's development. The statement points out the Council's regret at some of the school's development, this cannot be allowed to continue.</p> <p>7. Para 2.2: More needs to be said about the new buildings by the school and how these should be better controlled in the future.</p> <p>8. Para 2.4: Make more of the impact of the 21C buildings, you seem to gloss over this addition, it cannot be used to set a new more modern theme for the area. Note the use of a temporary structure on the northern border of the school.</p> <p>9. Para 4.1: "Joyless" is a perfect word for what it's like living with the school and its lack of consideration for the area and its residents. (See further comments below).</p> <p>10. Para 4.1: (top of page 9) See my point about para numbering. NW corner seems to be a messy industrial area, dumping ground for school trash and building slag, access gates without dropped curbs suggest some form of unplanned access point. This needs addressing. It would help if you were specific here.</p>	
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10	Visitor	Agree	The rate at which Brighton College are buying up residential properties in the nearby area and turning them into boarding houses, means that their impact is greater than just in the College Conservation Area. There is an increasing impact on the nearby residential area. It works both ways. The College has a big impact on local residents and their environment.	
11	Resident	Agree		
12	Resident	Strongly Disagree	<p>The College conservation area comprises Brighton College and some of the surrounding roads. Brighton College comprises some mock-Gothic architecture and a diverse collection of modern buildings and is of little architectural significance or historical importance. The surrounding roads are clearly residential. The Statement says that "Though there is a significant amount of residential terraces in the conservation area its character is not predominantly residential as the area is primarily dominated by the outward appearance of the Brighton College buildings and its grounds." (p.1/ p.2) This is a false conclusion; the fact that Brighton College is the largest single entity in the College Conservation area does not imply that the character of the homes in the surrounding roads are not residential. Describing their character as non-residential will make it easier for Brighton College to pursue developments that are inappropriate for a residential area and expand further into Kemptown, which would be damaging to the character of Kemptown as a whole. To allay that possibility I believe that Walpole Road and the other roads in the area should be removed from this conservation area, leaving just Brighton College to dominate its conservation area alone. To be clear, I strongly resent the statement on page 1 that the houses in Walpole Road, Walpole Terrace, College Terrace, Sutherland Road, Canning Street and the Western end of Belle View Gardens are not residential and do not have a residential character. If denying the residential character is a consequence of their inclusion within the College Conservation Area then they should be removed from the College Conservation Area.</p> <p>Also, the Conservation Area should not be considered independently of the character of Kemptown of which it is part. Decisions taken about the conservation area have implications for the character of Kemptown as a whole which should be</p>	<p>I would like to add the following additional comments regarding the College Conservation Area Character Statement, for consideration by the Planning Committee.</p> <p>Although many of the statements in draft document have upset myself and neighbours (i.e. residents in this area), there is one that I, and we, find particularly offensive:</p> <p>"Though there is a significant amount of residential terraces in the conservation area its character is not predominantly residential as the area is primarily dominated by the outward appearance of the Brighton College buildings and its grounds." (p.1/ p.2)</p> <p>If this assertion is approved, we will no longer be able to challenge planning applications by Brighton College on the grounds that a proposed development is incompatible with the residential character of our neighbourhood. Its approval by the City Council would remove this protection from further inappropriate development/expansion by Brighton College within the conservation area.</p> <p>I also feel that this statement demeans us: I have no wish to be "dominated" by Brighton College, culturally, architecturally, socially or in any way at all.</p> <p>The writer(s) of the draft Statement seem to have struggled to find a blanket term to describe the character of this area. Possibly that is because the area is not homogeneous. I'd like to suggest an alternative to such 'either/or' thinking, which is to recognize that this conservation area contains both a residential part and a non-residential part.</p>

		<p>taken into account in any planning applications. Otherwise, this conservation area has the potential for increasing the division and polarisation between Brighton College and the rest of Kemptown (including the roads immediately surrounding Brighton College).</p> <p>5 Do you think the character statement addresses the right buildings and locations? No</p> <p>6 If you answered 'no' in question 5 above, which are the buildings and locations you think should be addressed or should not be addressed? Which other buildings or locations should be addressed by the character statement? The Statement's recommendations focus on 3 issues: (1) some missing railings at the back of Brighton College, (2) a stretch of wall at the southern end of Walpole Road and (3) the merits of the Woolton building. These are relatively trivial issues compared to other issues raised by residents, such as anti-social parking, traffic congestion, access to Brighton College from Walpole Road to vehicles other than 'emergency access "for fire tender vehicle access only" (as specified by City Council's decision that approved planning application BH2013/01912) and the 'temporary' use of Walpole Road for heavy goods and construction vehicles for almost a decade as each planning application from Brighton College has been followed by each subsequent one.</p> <p>The statement also fails to address the really big question about how the character of the conservation area impacts on the character of the Kemptown area as a whole. This issue is addressed in my response to question 7 below. It would make no sense if decisions designed to enhance the character of the College Conservation area had a negative effect on the character of the larger Kemptown area of which it is a minor part.</p> <p>7 Do you have any further comments on the draft Character Statement? The College Conservation Area Character Statement seeks to give an historical account of the College Conservation Area, clarify the nature of the character of the Conservation Area and the properties within it and also provide an indication of the Council's approach to its preservation and enhancement and will be used by the Council in assessing the future planning proposals.</p> <p>I live in the southern part of Walpole Road within the College Conservation Area. This area is located within Kemptown which has a distinctive character. It was that distinctive character which drew me and my wife to move here about 40 years ago and then raise a family here. The College Conservation Area is part of Kemptown, geographically, historically, architecturally, culturally and socially.</p> <p>What was it about the character of Kemptown that so appealed to us? Well, estate agents at the time used the term 'Kemptown village' and it turned out not to be just estate agent hyperbole. The area around what was the John Nixon Memorial Hall Community Centre on St George's Road certainly had a 'village' feel. But there was, and is, so much more to this part of Brighton.</p> <p>There is a wide variety of people here, all ages and kinds and the atmosphere is relaxed, diverse and inclusive. For example, it was known as the most gay-friendly part of gay-friendly Brighton, at a time when queer-bashing was still common elsewhere in Britain. The diversity and inclusivity of Kemptown meant that social and gender distinctions were unimportant.</p>	<p>Perhaps the offensive statement could be replaced by something along the following lines: "The conservation area is made up of two parts: one part, involving eight streets (see Appendix A of draft Statement) is residential in character and the other part, comprising Brighton College buildings and grounds is not predominantly residential." I would be willing to accept this as an alternative to removing the 8 residential streets around Brighton College from the conservation area. Second, I have now had a chance to talk with residents who have an interest in the history of the wider Kemptown area and are knowledgeable about the history of the development of this conservation area. These accounts provide a very different account of this history from that in the current version of the Statement. For example: " In terms of factual information, the Character Statement gives the impression that when the original College buildings were erected between 1848 and 1866, they dominated the local area and it was only in the late 1870s, as a result of building south of Eastern Road, that the range of inward looking buildings on Eastern Road were erected. In fact building south of Eastern Road was contemporaneous with the College, if not earlier, with Bloomsbury Street being started in 1845, College Place in 1848, College Gardens in 1850 and Clarendon Place, Great College Street and College Road around 1856. In fact College Place began as Bury Street and only changed it's name to reflect its proximity to the College in 1850. The College has therefore been, from the beginning, an integral part of the community and it seems a pity that the Character Statement seems to regard it as a separate entity, ... Perhaps some consideration should be given to confining the conservation area to "within the College walls" so that the impact of their use of other houses and buildings in the area could be better viewed from the standpoint of neighbours and residents." The account of the history of the conservation area in the draft Statement reads as though it was produced after consultation with Brighton College and its own records. Since there are residents in the wider Kemptown area with a particular interest and knowledge of its history, were any of them consulted? Finally, I'd like to challenge the account of the architectural significance of the buildings in Brighton College campus that appears in the draft Statement, which again seems very biased towards the perspective of Brighton College. I'd like to offer, instead, the perspective of a resident of this area: Brighton College was established at the same time as the area to the south of it was being developed, filling in the land north of the Regency houses in the seafront; it was never in a setting with an open space in front of it, but was a part of the wider local community. The college itself combines a collection of mock-Gothic buildings together with a collection of modern buildings. The early buildings, like so many other private schools built in the 19th century, were imitation Gothic</p>
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		<p>The inclusivity went much further, however. In our experience, Kemptown has always welcomed the unconventional, the idiosyncratic and the free-spirited. As a result, it has always had a disproportionate number of artists and more than its fair share of interesting individuals. The term 'Bohemian' would be going too far; the character of Kemptown is more open, relaxed and diverse than that. A by-product of this is that social status seems much less important than in most other communities.</p> <p>If I had to choose 3 values to describe Kemptown, they would be equality, freedom and tolerance. It is probably this set of values that makes Kemptown such a good place to live. It is striking that around times of political elections it is mostly Labour party posters that can be seen in the windows of this neighbourhood. Descriptors like 'social' and 'community' sit comfortably with descriptors like 'freedom' and 'individual'.</p> <p>Because those are the important values of this neighbourhood, the fact that it was, and is, sometimes a bit scruffy has never seemed very important. Superficial appearance does not seem to rank highly amongst Kemptown's core values. Where does the College Conservation Area Character Statement fit into this? The Statement provides an interesting, if College-centred, account of the role of the Brighton College in the establishment and urbanisation of this area. When we moved to Kemptown all those years ago the College was a sleepy mediocre private school tolerated by the residents of Kemptown. Since then the college has become more financially and academically successful, more commercially aggressive and the centre of a multinational enterprise (- I believe that Brighton College International has schools in 7 countries so far and plans for 7 schools in Vietnam). The college now feels increasingly like a cuckoo in the Kemptown nest. Certainly, its values are very different from the values of the rest of Kemptown of which it is a part. Viewed from the perspective of a Kemptown resident, the three main values of Brighton College seem to be competition, status and wealth. This raises the prospect of a clash of values of a divisive kind within our community.</p> <p>This should be taken into account in any planning decisions around preserving or enhancing the character and appearance of the Conservation area.</p> <p>In recent years Brighton College has expanded in various ways into the rest of Kemptown. This has crowded out more socially valuable developments and activities and has had a negative effect on the character of Kemptown. For example, the growing number of Brighton College uniformed students around Kemptown is a homogenising factor with a negative impact on the eclecticism of Kemptown's character and its 'village' vibe.</p> <p>The Statement focuses on three parts of the Brighton College estate in Kemptown: the Woolton Building, repair and replacement of missing railings and the college wall at the southern end of Walpole Road.</p> <p>The Woolton building does not seem offensive to me as it is part of row of buildings along Sutherland Road that are startling in their diverse and irregular architectural forms.</p> <p>I would, of course, be pleased if the college would repair and maintain missing railings as diligently as it maintains the railings of the frontage façade on Eastern Road that it uses to advertise to its potential customers.</p>	<p>creations intended to look older than they really are to create a false impression of venerable age. The rest of the mock-Gothic buildings are more recent constructions from the late 19th century to the early 21st century. The collection of modern buildings, by contrast, conform to no common architectural style and together they display an incoherent appearance. When the mock-Gothic buildings and the mixed bag of modern buildings are viewed together, it is difficult to recognise much of architectural significance in the resulting hodgepodge of structures.</p> <p>In summary, it is hard to accept that the campus as a whole is of much historical importance or architectural significance.</p> <p>Brighton College has clearly become a multinational enterprise (- I understand that Brighton College International now has schools in at least seven countries -) which markets itself to wealthy individuals from overseas. It is presumably in the interests of the marketing efforts of Brighton College to present its main campus as venerable, historically important and architecturally significant.</p> <p>The core question for me from the above is: does the City Council prioritize the interests of Brighton College over the interests of the residents/voters of this part of Brighton? The fate of the draft Statement will provide an answer to this question.</p>
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			<p>“Many additions have been made to the school building in the last twenty years and the school is likely to further develop their campus in future years.” (p.11)</p> <ul style="list-style-type: none"> • Its recommendations/conclusions, which focus on three particular issues (railings, Woolton Building and wall at the south end of the Walpole Road) look like ones that might have been chosen by Brighton College. <p>The production of such a Brighton College-centred perspective on the character of the area raises a question: were there any discussions (formal or informal) with Brighton College or its representatives in the preparation of this CCAC Statement? If so, that could account for such a Brighton College-centred Statement. And if so also, were there equivalent discussions with the residents within the area? I'm concerned about how the Statement was prepared.</p> <p>I'm also concerned about how the Council communicated this consultation exercise to local residents. Those concerns include:</p> <ul style="list-style-type: none"> • Very limited communication of the consultation exercise within the Conservation area. When we counted, there were two small notices attached to lampposts until the end of October (one at the south end of Walpole Road and one at the end of Canning Street). At the start of November the number of these notices doubled to 4 and at the start of this week more have appeared. This doesn't meet the minimum standard of communication for this sort of consultation. • We believe that no notices of the consultation exercise were displayed outside the boundaries of the Conservation area itself. This disenfranchises the residents of surrounding areas such as the residents of Kemptown south of Eastern Road who have a significant stake in the outcome of this consultation and excludes their voice. • We are not aware of any fliers or mailouts sent to residents affected. <p>Together, these amount to a distressingly poor level of communication for a genuine consultation exercise.</p> <p>In my view the CCAC Statement is a lop-sided account of the character of the CCA that is heavily tilted towards the interests and future development/expansion of the College and against the residents/voters within the area.</p>	
13	Resident	Agree		
14		Disagree	<p>The College conservation area comprises Brighton College and some of the surrounding roads. Brighton College comprises some mock-Gothic architecture and a diverse collection of modern buildings and is of little historical or architectural significance or particular merit. The surrounding roads are clearly residential.</p> <p>The Statement says that “Though there is a significant amount of residential terraces in the conservation area its character is not predominantly residential as the area is primarily dominated by the outward appearance of the Brighton College buildings and its grounds.” (p.1/ p.2) This is a false conclusion; the fact that Brighton College is the largest single entity in the College Conservation area does not imply that the character of the homes in the surrounding roads are not residential. Describing their character as non-residential will make it easier for Brighton College to expand further into Kemptown, which would be damaging to the character of Kemptown as a whole. To allay that possibility I believe that Walpole Road and the other roads in the area should be removed from this conservation area, leaving just Brighton College to dominate its conservation area alone.</p>	

			<p>To be clear, we strongly resent the statement on page 1 that the houses in Walpole Road, Walpole Terrace, College Terrace, Walpole Terrace, Canning Street and the Western end of Belle View Gardens are not residential and do not have a residential character. They should be removed from the College Conservation Area.</p> <p>Also, the Conservation Area should not be considered independently of the character of Kemptown of which it is part. Decisions taken about the conservation area have implications for the character of Kemptown as a whole which should be taken into account in any planning applications. Otherwise, this conservation area has the potential for increasing the division and polarisation between Brighton College and the rest of Kemptown (including the roads immediately surrounding Brighton College).</p>	
15	Resident	Disagree	<p>the claim that 'It's character is not predominantly residential' is untrue and gives the college future permission to disregard the residents.</p> <p>The school used to be a local school serving the local community, albeit a private school. But for a small fee local households could use the sports facilities on Wednesday evenings and Sundays. All the neighbours were invited to Christmas midnight mass in the chapel. A November 5th firework display was held on the cricket pitch which all the neighbours enjoyed. It is only in the last few years that the school separated itself from the community and treated it's neighbours with disrespect and disregard.</p> <p>Re the remark about uPVC windows in Canning Street, perhaps the planning department should start paying the heating bills of the local residents. It would then be less disapproving of such installations.</p>	
16	Resident	Disagree	<p>The character statement strongly favours Brighton College and underestimates the importance of local residential housing. This has serious implications for future plans of Brighton College to buy up local houses and to expand as the area statement very much downplays the residential character of Canning Street.</p>	
17	Resident	Disagree	<p>The character statement underestimates the importance of local residential housing and elevates the importance of Brighton College. This has serious implications for any future plans of Brighton College to expand and buy up housing as the area statement downplays the residential nature of Canning Street.</p>	
18	Resident	Strongly Disagree	<p>Canning street should be removed from this conservation area. There is a lot of concern about Brighton college buying up residential homes and turning them into student Accomodation or administration buildings in this area. This is already changing the residential profile of our neighbourhood. The focus is on the conservation area conserving whatI'd like to understand this a whole lot better. And benefits whom?</p> <p>Being in this college conservation area seems like it gives power to the conservation zone to determine decisions regarding improvements to our homes without any financial support. For example, pvc double glazed windows cost a lot less than their wood counterparts (third of the price) and yet as effective in this era of high utility bills. And helps with insulating our homes during this climate crisis</p>	<p>As above..... in addition it does not address the impact already of Brighton college buying up properties on our residential streets. As it stands the college now owns half the houses on Walpole road and another large house (maybe 2 houses) round the corner. This is a residential area, a neighbourhood, that is being seriously affected by Brighton college business and opportunistic 'goals' to expand at the expense of our community and neighbourhood.</p> <p>I strongly oppose this character statement and feel it's loaded in favour of Brighton college expanding beyond their grounds into our residential community. Buying up residential homes, and inflating house prices in the area too. Changing the residential makeup of our neighbourhood. It seeks to take control of decisions about planning home improvements</p>

			<p>....wood also needs a lot of upkeep and maintenance (to keep it protected from the weather.... All of which impacts on our environmental challenges.</p> <p>There is also an issue of consistency.... The college can modernise and use plastic components (ie new building uses those U shutters/windows on Sutherland Road) but we can't! and And it's suggested in the report that pvc be prohibited in the zone. That's downright wrong.</p>	and there is a lot of concern that Brighton council are not sufficiently distanced enough from the college and its expansion plans. And that both the college and council are not prioritising the strong residential community we wish to remain.
19	Resident	Disagree	I believe that the boundary of the College Conservation Area should be redrawn so that all the residential buildings which are not the property of Brighton College lie outside it.	
20	Resident	Strongly Disagree		
21	Visitor	Disagree	All adjacent streets listed should be removed from the conservation area and remain subject to normal planning rules only.	
22	Resident	Strongly Disagree	<p>I am stunned by the lack of economic, social, and historical perspective in the Document. There is no credence afforded to housing and community needs in Brighton. It's as if the College stands resplendent and ignorant of societal progress. No historical perspective of such changes is evidenced anywhere in the report. It's as if the only consulate in its recent preparation may have been the College administration itself; still imagining they are in a 19th Century of control. It may have escaped notice in the Document's preparation but the birth of the Labour Party in the 19th Century led to the NHS (local NHS Hospital) & free School education that did not exist in the 1900s. The College, whilst its inward facing buildings may be doubtless of historical interest bears no relation to the vast majority of the country's schools and in terms of numbers -but clearly not of undue and still extending influence (see the number of Public School members of the Current Cabinet) - is but an historical anachronism of privilege and of course, lest it be said out aloud) inequality. And, recent outfacing building would certainly not bring visitors from afar. Incidentally, I'm unsure outsiders are let inside to view which makes its historical importance to the Public somewhat questionable. So, in that context what should be addressed is the impact of the College developments on the vicinity.</p> <p>First, it is buying up residential properties in the neighbourhood for expansion. (There needs to be an itemised record of all such buildings in the wider Kempdown area). And the area is a residential area contributing to the wider Kempdown Village charactersists. Its children have gone and are going to to state Schools . The College is partly destroying that historical development of, post 19th century, Brighton workers living environment. Brighton College parents are also buying up property for their children which also detracts from a sense of community. The almost unwritten contention in the report that local residential provision is of secondary importance to the Conservation Area is deeply erroneous if not offensive to its residents most of whom couldn't, even if they wished, send their children to the College.</p> <p>Secondly, any development facing outwards has to have a 21st century sympathetic and unobtrusive effect on Kempdown residents.</p> <p>Thirdly, the College's seemingly favourable (and strangely 'residential')! parking permit arrangements affect the area further afield too than the designated conservation area and needs to be itemised and scrutinised</p>	

			<p>Fourthly, the College is now an international enterprise. Such undoubted financial investment should not be allowed to pay scant attention to the areas local housing and community needs as more than hinted at in this report.</p> <p>Fifthly, the College, albeit a Charity, efforts no consideration to enjoining the local community in its extraordinary facilities nor plans for development which could affect them. Almost as if the local community is not consultable and doesn't need to be</p>	
22	Resident	Strongly Disagree	<p>The College conservation area comprises Brighton College and some of the surrounding roads. Brighton College comprises some mock-Gothic architecture and a diverse collection of modern buildings and is of little architectural significance or historical importance. The surrounding roads are clearly residential. The Statement says that "Though there is a significant amount of residential terraces in the conservation area its character is not predominantly residential as the area is primarily dominated by the outward appearance of the Brighton College buildings and its grounds." (p.1/ p.2) This is a false conclusion; the fact that Brighton College is the largest single entity in the College Conservation area does not imply that the character of the homes in the surrounding roads are not residential. Describing their character as non-residential will make it easier for Brighton College to pursue developments that are inappropriate for a residential area and expand further into Kemptown, which would be damaging to the character of Kemptown as a whole. To allay that possibility I believe that Walpole Road and the other roads in the area should be removed from this conservation area, leaving just Brighton College to dominate its conservation area alone.</p> <p>To be clear, I strongly resent the statement on page 1 that the houses in Walpole Road, Walpole Terrace, College Terrace, Sutherland Road, Canning Street and the Western end of Belle View Gardens are not residential and do not have a residential character. If denying the residential character is a consequence of their inclusion within the College Conservation Area then they should be removed from the College Conservation Area.</p> <p>Also, the Conservation Area should not be considered independently of the character of Kemptown of which it is part. Decisions taken about the conservation area have implications for the character of Kemptown as a whole which should be taken into account in any planning applications. Otherwise, this conservation area has the potential for increasing the division and polarisation between Brighton College and the rest of Kemptown (including the roads immediately surrounding Brighton College).</p>	<p>The Statement's recommendations focus on 3 issues: (1) some missing railings at the back of Brighton College, (2) a stretch of wall at the southern end of Walpole Road and (3) the merits of the Woolton building. These are relatively trivial issues compared to other issues raised by residents, such as anti-social parking, traffic congestion, access to Brighton College from Walpole Road to vehicles other than 'emergency access "for fire tender vehicle access only" (as specified by City Council's decision that approved planning application BH2013/01912) and the 'temporary' use of Walpole Road for heavy goods and construction vehicles for almost a decade as each planning application from Brighton College has been followed by each subsequent one.</p> <p>The statement also fails to address the really big question about how the character of the conservation area impacts on the character of the Kemptown area as a whole. This issue is addressed in my response to question 7 below. It would make no sense if decisions designed to enhance the character of the College Conservation area had a negative effect on the character of the larger Kemptown area of which it is a minor part.</p> <p>The College Conservation Area Character Statement seeks to give an historical account of the College Conservation Area, clarify the nature of the character of the Conservation Area and the properties within it and also provide an indication of the Council's approach to its preservation and enhancement and will be used by the Council in assessing the future planning proposals.</p> <p>I live in the southern part of Walpole Road within the College Conservation Area. This area is located within Kemptown which has a distinctive character. It was that distinctive character which drew me and my wife to move here about 40 years ago and then raise a family here. The College Conservation Area is part of Kemptown, geographically, historically, architecturally, culturally and socially. What was it about the character of Kemptown that so appealed to us? Well, estate agents at the time used the term 'Kemptown village' and it turned out not to be just estate agent hyperbole. The area around what was the John Nixon Memorial Hall Community Centre on St George's Road certainly had a 'village' feel. But there was, and is, so much more to this part of Brighton.</p> <p>There is a wide variety of people here, all ages and kinds and the atmosphere is relaxed, diverse and inclusive. For example, it was known as the most gay-friendly part of gay-friendly Brighton, at a time</p>

				<p>when queer-bashing was still common elsewhere in Britain. The diversity and inclusivity of Kemptown meant that social and gender distinctions were unimportant.</p> <p>The inclusivity went much further, however. In our experience, Kemptown has always welcomed the unconventional, the idiosyncratic and the free-spirited. As a result, it has always had a disproportionate number of artists and more than its fair share of interesting individuals. The term 'Bohemian' would be going too far; the character of Kemptown is more open, relaxed and diverse than that. A by-product of this is that social status seems much less important than in most other communities.</p> <p>If I had to choose 3 values to describe Kemptown, they would be equality, freedom and tolerance. It is probably this set of values that makes Kemptown such a good place to live. It is striking that around times of political elections it is mostly Labour party posters that can be seen in the windows of this neighbourhood. Descriptors like 'social' and 'community' sit comfortably with descriptors like 'freedom' and 'individual'.</p> <p>Because those are the important values of this neighbourhood, the fact that it was, and is, sometimes a bit scruffy has never seemed very important. Superficial appearance does not seem to rank highly amongst Kemptown's core values.</p> <p>Where does the College Conservation Area Character Statement fit into this? The Statement provides an interesting, if College-centred, account of the role of the Brighton College in the establishment and urbanisation of this area. When we moved to Kemptown all those years ago the College was a sleepy mediocre private school tolerated by the residents of Kemptown. Since then the college has become more financially and academically successful, more commercially aggressive and the centre of a multinational enterprise (- I believe that Brighton College International has schools in 7 countries so far and plans for 7 schools in Vietnam). The college now feels increasingly like a cuckoo in the Kemptown nest. Certainly, its values are very different from the values of the rest of Kemptown of which it is a part. Viewed from the perspective of a Kemptown resident, the three main values of Brighton College seem to be competition, status and wealth. This raises the prospect of a clash of values of a divisive kind within our community. This should be taken into account in any planning decisions around preserving or enhancing the character and appearance of the Conservation area.</p> <p>In recent years Brighton College has expanded in various ways into the rest of Kemptown. This has crowded out more socially valuable developments and activities and has had a negative effect on the character of Kemptown. For example, the growing number of Brighton College uniformed students around Kemptown is a homogenising factor with a negative impact on the eclecticism of Kemptown's character and its 'village' vibe.</p>
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				<ul style="list-style-type: none"> • The CCAC statement seems to be an attempt by the Council to get an answer to the question: what is the character of the College Conservation Area? And a summary of the answer it provides is: "Though there is a significant amount of residential terraces in the conservation area its character is not predominantly residential as the area is primarily dominated by the outward appearance of the Brighton College buildings and its grounds." (p.1/ p.2) • It provides a history of the area that starts with the building of Brighton College from 1848 followed by the building of roads around it to the North, West and East in the late 19th century and early 20th century. This too implies that, historically also, the residential areas of the CCA occupy a marginal position under the dominating presence of Brighton College. It would, of course, have been equally possible to write a history of the CCA starting much earlier with the Regency buildings on the seafront and gradually extending northwards, with the building of Brighton College as just one step in that process. • The CCAC Statement makes clear that it does expect to receive further planning applications from BC for developments within the CCA. For example: "Many additions have been made to the school building in the last twenty years and the school is likely to further develop their campus in future years." (p.11) • Its recommendations/conclusions, which focus on three particular issues (railings, Woolton Building and wall at the south end of the Walpole Road) look like ones that might have been chosen by Brighton College. <p>The production of such a Brighton College-centred perspective on the character of the area raises a question: were there any discussions (formal or informal) with Brighton College or its representatives in the preparation of this CCAC Statement? If so, that could account for such a Brighton College-centred Statement. And if so also, were there equivalent discussions with the residents within the area? I'm concerned about how the Statement was prepared.</p> <p>I'm also concerned about how the Council communicated this consultation exercise to local residents. Those concerns include:</p> <ul style="list-style-type: none"> • Very limited communication of the consultation exercise within the Conservation area. When we counted, there were two small notices attached to lampposts until the end of October (one at the south end of Walpole Road and one at the end of Canning Street). At the start of November the number of these notices doubled to 4 and at the start of this week more have appeared. This doesn't meet the minimum standard of communication for this sort of consultation. • We believe that no notices of the consultation exercise were displayed outside the boundaries of the Conservation area itself. This disenfranchises the residents of surrounding areas such as the residents of Kemptown south of Eastern Road who have a significant stake in the outcome of this consultation and excludes their voice.
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				<ul style="list-style-type: none"> We are not aware of any fliers or mailouts sent to residents affected. <p>Together, these amount to a distressingly poor level of communication for a genuine consultation exercise.</p> <p>In my view the CCAC Statement is a lop-sided account of the character of the CCA that is heavily tilted towards the interests and future development/expansion of the College and against the residents/voters within the area.</p>
23	Visitor	Disagree	My answer to question 4 covers this.	I am a resident of Upper Abbey Road, therefore very local to the 'College Conservation Area', and use the roads in the 'CCA' on a daily basis.
24	Resident	Strongly Disagree	I am a resident of Upper Abbey Road, therefore very local to the 'College Conservation Area', and use the roads in the 'CCA' on a daily basis.	<p>The draft Statement ignores many problems endured by residents and caused by the college's operations, such as daily traffic jams and illegal parking in Walpole Road, Belle Vue Gardens and Sutherland Road, never-ending construction traffic as one inappropriate building after another is built by Brighton College.</p> <p>The Statement focuses on some issues that are of little consequence for the residents of the Conservation area i.e. (1) some missing railings at the back of Brighton College, (2) a stretch of wall at the southern end of Walpole Road and (3) the merits of the Woolton building. These look like the sort of issues that might have been chosen by Brighton College had they been consulted on the matter.</p>
25	Resident	Disagree		What I find particularly concerning is the framing of the statement seemingly as a means of easing the passage of further redevelopment of the college.
26	Resident	Disagree	<p>The wording of the statement implies that the surrounding residential properties were developed after the school was established rather than as natural conurbation from the sea front which was established much earlier than the school.</p> <p>The emphasis of the statement is to preserve the character of the area, despite planning approval for some dramatic architectural changes by Brighton College. If you include the surrounding streets within the College Conservation then it is possible that these streets may also change dramatically.</p> <p>I propose that Walpole Road, Walpole Terrace, Belle Vue Gardens, Canning Street, College Terrace and Hendon Street be removed from the College Conservation Area.</p>	<p>Although the statement discusses the character of the area in terms of buildings, I think it is important to draw your attention to a number of negative impacts that Brighton College has on our livelihoods as residents in the area.</p> <p>Twice a day we are subjected to dangerous speeds and parking violations from large vehicles at drop off and pick up at school.</p> <p>Brighton College has itself contributed very little to the area despite subjecting residents to increased noise and dust while it expands its campus building projects, and very limited parking, taken up by teachers and site workers who could be directed to the sea front which is a short walk away.</p> <p>The school does not adequately maintain the surrounding trees, only pollarding the ones directly in front of our house because we requested it, whilst neglecting trees further towards Walpole Road.</p> <p>During the Summer months the campus is sublet to various student organisations and the residents are exposed to noise echoing through the playing fields until late at night.</p>
27	Resident	Strongly Disagree	The missing railings at the back of Brighton College are of no consequence at all for the residents of the Conservation area.	The failure of Brighton College to engage with the local community surrounding the Conservation Area and Kemp Town below Eastern Road in this consultation exposes the true interests of the College and its failure to up-hold the contract that charitable status requires of

				<p>private education institutions, that is to be of a positive benefit to the community.</p> <p>The College gave minimal and very short notice (five days!) of its intentions, and many residents have only discovered the existence of this consultation process by sheer accident.</p>
28	Resident	Strongly Disagree	<p>The draft Statement ignores many problems endured by residents and caused by the college's operations, such as daily traffic jams and illegal parking in Walpole Road, Belle Vue Gardens and Sutherland Road, never-ending construction traffic as one inappropriate building after another is built by Brighton College. The Statement focuses on some issues that are of little consequence for the residents of the Conservation area i.e. (1) some missing railings at the back of Brighton College, (2) a stretch of wall at the southern end of Walpole Road and (3) the merits of the Woolton building. These look like the sort of issues that might have been chosen by Brighton College had they been consulted on the matter.</p>	<p>My objections can be distilled into a top ten.</p> <p>The absurd assertion that the homes in the streets surrounding Brighton College are not primarily residential.</p> <p>Failure to address the real concerns of the residents of the College Conservation area such as antisocial parking, traffic congestion and endless construction traffic from endless building work by the college.</p> <p>Failure to contextualise the character of the College Conservation area within the character of the wider Kemptown area of which it is part. This conservation area should be considered within the wider surrounding area, taking into account, especially, the character of Kemptown as a whole. The statement should also address how the character of Kemptown (and other surrounding areas) are affected by the activities and developments within the College Conservation area.</p> <p>Failure to engage the neighbourhoods (and local authority wards) surrounding the Conservation Area such as Kemp Town below the Eastern Road in this consultation exercise, when they clearly have a stake in its outcome.</p> <p>Failure to control the expansion of Brighton College beyond the college campus and into the Kemptown more widely with significant negative consequences.</p> <p>Failure to consult properly in preparing the Statement.</p> <p>Failure communicate properly this consultation exercise in more than a tokenistic way. The formal consultation period started on the 13th October and will end on the 17th November. When I counted, there were two small notices attached to lampposts until the end of October (one at the south end of Walpole Road and one at the end of Canning Street). At the start of November the number of these notices doubled to 4 and at the start of this week (13th Nov.) more have appeared. This seems like a very poor level of communication for a genuine consultation exercise.</p> <p>There seems to have been no real communication with the residents living just outside the Conservation Area, such as those in Kemptown south of Brighton College. So many people in the Kemptown ward are probably unaware of the CCAC Statement as the only notices seem to</p>

				<p>be North of Eastern Road, which means that their voices have effectively been excluded from this consultation exercise. Decisions taken about the conservation area have implications for the character of Kemptown as a whole which should be taken into account in any planning applications. Otherwise, this conservation area has the potential for increasing the division and polarisation between Brighton College and the rest of Kemptown.</p> <p>The story of this area that starts with the building of Brighton College from 1848 followed by the building of roads around it to the North, West and East in the late 19th century and early 20th century is partial and myopic. Historically, the College was being developed at the same time as the area to the south of it rather than being a setting with an open space in front: it's history was a part of the development of the wider local community.</p> <p>Failure to recognise that Brighton College comprises a pastiche of mock-Gothic architectural confections (patched together at different dates from the mid-19th century to the early 21st century) mixed with a diverse and erratic collection of modern buildings, which together are of little architectural significance or historical importance.</p> <p>Overall, we are anxious that this Statement shows a bias towards the perspective of Brighton College and will encourage the further expansion of Brighton College as it marginalises the voices of the residents/voters living near the college.</p>
29	Resident	Disagree		<p>My comments placed on this council website are in response to your document entitled College Conservation Area Character Statement... I have used your notation system for guidance to make it easier for readers.</p> <p>5:1. "Pressures for change" I would like to call into criticism the tone, delivery and obvious preordained decisions contained in this document. There are many points drawn up within this College Conservation Area Character Statement that possess an undisguised bias and favour towards Brighton College, from the start. Documents of such nature should seek a centreline and not 'punch-down' on those that it should seek to protect.</p> <p>I am near incandescent with the demeaning manner, and lack of hubris contained within the 16 pages of the council document. With its belittling remarks about the surrounding residences around Brighton College School, the document is both one-sided and dismissive of the contribution of the homes and families that share the conservation space with the school.</p>

			<p>Let me be clear, Brighton College, whilst an independent school, is a commercial concern. Albeit, an old business, this document should not be in favour of the school just because of its 178-year-old history. The character statement should not just be centred around the business of the school, but also about the homes, families and lives of people who live and work in the whole conservation area. For better or worse, all these component parts make up the conservation area, not just the school, as the author so contemplates.</p> <p>It should be also noted that the school has in the last 10 years used the argument of its age, that it is an award-winning business, its RIBA awards to enlarge its architectural footprint; in truth, none of these things benefit the conservation area in which the school exists, other than the school it self.</p> <p>Further evidence of the school as a commercial concern: the school rents out rooms and the grounds during the summer holiday break. Whereas other schools in the area take a break for 6 weeks. Brighton College does not close, but rather, invites international students to stay at the school for further income. The residents facing the school, never get a rest or respite from the continual business activities of the school.</p> <p>To draw a comparison of the schools ravenous architectural needs, Brighton College has some 1600 students all within the space of 3 acres. And, within this space (the senior school in particular), the school has maintained a continuous building programme without end.</p> <ul style="list-style-type: none"> · 2013: New House · 2014: Cairns Tower · 2015: The Music School and Sarah Abraham Recital Hall · 2017: Alexander House · 2017: The Kai Yong Yeoh Building · 2020: the School of Sports and Science – this £55 million building, which includes 18 university-standard laboratories, a rooftop running track, a swimming pool, and a double-height sports hall. · 2024: the completion of a 400-seat multifunctional theatre, dance and drama studio. That includes classrooms for English and Drama and a social space for gatherings. <p>Seemingly, the school's central strategy is to build on the land of the main school, reduce the local housing stock by buying properties, and turn them into dorms or classrooms. The school must now cease this unending demand upon its neighbours and look to coexist, in a kind and respectful manner.</p> <p>If the school wishes to expand, it must change its strategy. To either move from its current site, or purchase land away from the conservation area, to allow a calm pause in its building demands. Or,</p>
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				<p>purchase commercial properties within Brighton, a suitable distance away from the conservation area, without taking valuable necessary homes in a city with a well documented housing shortfall!</p> <p>Westminster School London An independent school that exists within a city can still grow, but not at the immediate cost to all else. Westminster School, first built in 1016. The school recognises that its geographic location land is limited, and has therefore sought classroom space from elsewhere within the Westminster area. For example, the school uses the Royal Horticultural Hall in part for the Great School. As of 2019, the school has rebuilt the Adrian Boult Centre for its music needs. Other properties around the Westminster area provide rooms for the pre-prep and prep school.</p> <p>Closer-to-home schools, like Worth, Hurstpierpoint, Lancing, and Lewes Grammar School all within the Sussex borders, have not impinged on their neighbours, as they have the space to do so. Their acreage ranges from 57 to 500 acres. However, more importantly, they typically have a student total of between 600 and 700, students as opposed to Brighton College School's 1600 students.</p> <p>Brighton College The evidence here is that the business of being Brighton College is creating its own problem. As the UK's most expensive independent school – by increasing its student amounts, it needs more buildings. With more buildings, it will seek to increase the number of students.</p> <p>Therefore, my first recommendation, is that the school cease its building plans, as it does not have the local space within the conservation area to continue further development.</p> <p>Secondly, I would also like to draw your attention to the fact that Brighton Council appears to pander to the Brighton school's building needs like no other organisation within the council's purview.</p> <p>Amex, The Police Station, and American Express</p> <p>Each of the above organisations in the title have reached, in their history, a limit to their capacity, and each has sought a sustainable remedy. One that is conducive to their needs and to the local residents. Both the Amex and the John Street Police Station needed to modernise for the 21st century, and did so at speed.</p> <p>John Street Police Station</p>
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				<p>Was modernised, revamped, and completed in 2018, it is equipped to meet the needs of a modern police force.</p> <p>“The building is now fit for expected future policing demands in the city, as we continue to transform how we work”.</p> <p>Chief Superintendent Lisa Bell, divisional commander for Brighton and Hove</p> <p>Amex Grounds New grounds were found for Brighton & Hove Albion FC 6.6 miles from its old ground. Once found, apart from the council's long decision in confirming the bigger stadium, it took only 3 years to build the stadium and is expected to last the Seagulls at least 50 years.</p> <p>American Express To meet the demands of the 21st century, the company moved 100 meters from its old address. And “built a vibrant, highly articulated building, that offers a sustainable and future-proofed working environment”.</p> <p>5:2: Canning Street, Walpole Terrace & Road, College Terrace and Belle Vue Gardens (in part) All have homes, families, young and old, all living their lives together. The streets are communities and networks. People working from home, people on their journey to work. Small businesses, retired folk and newborns all co-exist in these five streets. They are bound and entrust in each other to live above, below, and next door. Each obeying the rules, coexisting with their neighbour.</p> <p>The residential area is often described by estate agents:</p> <p>Canning Street and Walpole Terrace are “known for their beautifully presented homes”, many of which “retain many original features of the period”. They are often “meticulously renovated to an incredibly, high standard throughout”. “Stylish and imposing”, “often with two, three, or four bedrooms. All of the houses are a perfect mix of charm, elegance and modern living”.</p> <p>Canning Street is a street that would rival any in the borough of Kensington and Chelsea. With its annual window display during the month of December, whereby, the residents, in turn, put up an advent-themed display in their front window daily. And at the stroke of 6 pm, the neighbours come to that home to eat warm mince pies and share mulled wine. The summer street party is a regular fixture for all the residents to attend. Halloween is another regular date in the calendar for 4 to 10-year-olds to scare the residents with their trick-or-treating.</p>
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				<p>It is absolutely disingenuous of the author of the College Conservation Area Statement to degrade the merit of this street and its contribution to the atmosphere of the area. Walpole Terrace with its tall white buildings caught against the sun, stands to the east of the school. The homes are beautifully taken care of as are the properties on the College Terrace that stand to the north of the school.</p> <p>Belle Vue Gardens Is home to many beautifully well-presented Victorian and Edwardian homes all along the road, all of which are homes to families.</p> <p>Walpole Road, whilst there are only a few homes on the street, the homes are beautifully cared for, with many longstanding family owners. This street in particular is under constant attack by the school. Whilst the school has made an effort with its cones to reduce the habitual bad parking, parents dropping off students, the constant double parking, or parking in dangerous places around the prep school, lorries turning in the street, and the noise of the dorms.</p> <p>As if this is not bad enough the school has bought buildings on either side of the genuine homes. The road like the school grounds has been in a state of constant building. And, whilst the properties once owned by the school are restored to superb order, the mix of a commercial organisation and family homes is not working. The families in Walpole Road are constantly having to defend themselves, protest, suffer the noise, dust, and the constancy of building works without end, by the school.</p> <p>The New Character Statement to include the following: It is feasible for any organisation/business to grow, but not at the expense of the local inhabitants. Brighton College is a commercial enterprise that looks to ride roughshod over the local residents who have not had a say in the conservation. That is until now.</p> <ol style="list-style-type: none"> 1. That the boundaries include the streets currently noted, remain in the current 2023 College Conservation Area. They are an invaluable component to the conservation area. 2. The school must cease building within the grounds of the senior school for the next 50 years. Its current footprint and height is to remain as it is today. If a building fails in that 50 year period, the school, once it has considered all other options can build on that footprint to that size and height. Post a consultation with the local residents, of which no less than 10 people must be made aware, none of which can be staff at the school.
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				<p>All plans that are forthcoming, are to be resisted as unnecessary and out of scale with the conservation area.</p> <p>3. That the school does not purchase any more homes within the conservation area or at least 1000 meters from the senior school, whichever is the minimum distance. To maintain the housing stock for families who wish to live in the area.</p> <p>4. That the school contributes an annual stipend of 500,000 pounds to the College Conservation Area for the next 10 years for its upkeep. The fund would be overseen by both the school and a resident's group for the betterment of the area. The stipend would look to review itself at the end of the period and could be extended if found necessary.</p> <p>A: For example, UPVC double-glazed conservation-standard windows for buildings that face onto the school grounds to reduce the sound of the school, its building work and to keep the conservation theme. (Conservation standard, whilst more expensive than ordinary UPVC windows, are as close to the original window design as possible).</p> <p>B: The homes that cannot see the school but live within the conservation area, would be allowed to install UPVC "conservation standard" windows, and will be able to submit to the fund, for 50% towards the cost of the windows. The rest of the cost of the windows to be borne by the owners.</p> <p>This type of financial consideration action, has a precedent in that American Express, made a similar payment to its neighbour sharing the same space.</p> <p>"American Express gave the neighbouring Carlton Hill Primary School £300,000 to compensate for the negative effect the new building would have on its playground". Wikipedia 2009</p> <p>5. That the branches from the overhanging trees growing within the school grounds, yet overhanging the boundary fences are pruned back twice a year. That all leaves are picked up from the pavement and the road monthly during the autumn months, by a private contractor. Birds nest in the trees, and their excrement lands on the cars below, damaging them or at the very least, costing the owners a fee to wash them.</p> <p>6. That Victorian-period eco-style lamps are placed within the school grounds all along the green railings on Walpole Terrace and College Terrace at the expense of the school. At approx 20-meter intervals illuminating Walpole Terrace on the school side of the street. This side of the street is a hazard to all persons walking along the street at night.</p>
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				<p>7. The residents within the streets mentioned, should be allowed to install UPVC "conservation-standard" street-facing windows in their homes. "Conservation standard" doors that replicate the period of the homes original design. Modern designs would not be allowed.</p> <p>8. Either the fund would be used to re-tarmac the road surface on College Terrace or, the school independently have the road completely re-surfaced. It is in an abhorrent state, and should be sorted for the area, immediately.</p> <p>9. That the school leases from the Council, 2 more parking spaces at the bottom of Sutherland Road, for the safe parking of 4 coaches, to add to the bus stop space provided. The parking issue with regard to the coaches, has long been a safety bugbear for the residents of Sutherland Road and anyone who uses it.</p> <p>This action will stop the poor behaviour of the drivers who double park on the road when they bring students to the school. The poor parking etiquette by coaches, has long been an issue for the residents of the area, and it continues without abate. Leasing the space will tidy up the thoroughfare of the street and add to the neighbourly decorum of other road transport users, and the residents of the conservation area.</p> <p>10. As part of a resident's first strategy - all plans for the exterior fabric of the school must be seen 12 months ahead of their proposal to the council. The plans must be seen by at least 10 members of the conservation area, who are not employed by the school.</p> <p>Three of the 10 members will have direct liaison with the school. The membership should rotate each year, to allow the community to reflect its diversity in the conservation area. The opportunity to comment, will be extended to the owners and residents of Sutherland Road who are physically within line of sight can see the school from their bedroom windows.</p> <p>In conclusion</p> <p>I would also like to remark on the impoverishment of the council. Particularly to the council's lack of advertising the fact of such an important decision. The opportunity to comment was left completely by chance to just 5 x A4 sheets, strapped to lampposts under plastic bags around the conservation area.</p> <p>I know the above strategy to be poorly delivered because, the Council has just recently sent to my home address, an A5 double-sided</p>
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				<p>postcard outlining precisely what you want from regarding my opinion on additional licencing HMOs in the area.</p> <p>May I suggest that in all future correspondence concerning the school and the conservation area, that a postcard at the very least, be sent to every home for their opinion. Whatever the question, it should be clear, direct, and unstilted by a decision that seems to have been made already.</p> <p>I no longer wish to live under the tyranny of the business of the school. Within your document, you highlighted the fact that when the school was first built, the architecture was described as Joyless. In the year of our lord 2023, I would use the same term to describe the experience of living with the school, and its lack of appropriate building control over its business, is a joyless experience for those in and around the conservation area.</p> <p>Whilst the school has every right to put forward its building demands, it is for Brighton Council to administer these proposals, taking all points of view in. Clearly, from the amount of buildings allowed, this has not been the case. I wish for this virulent behaviour of the schools near out-of-control building demands, to be brought to a halt, and that Brighton Council who have previously endorsed all of the school's demands stop. It is your duty to as an agent of true conservation for the area.</p>
30	Resident	Strongly Disagree		<p>The College Conservation statement is College-centric. There doesn't seem to be any continuity in design and outlook in recent developments on the college such as the ugly and dominating sports centre, it seems to be that whatever the college does is right. When this happens within the boundaries of the college is one matter but the college's increasingly expansive outlook is coming to dominate the area. I have had to put up with years of construction work, increased traffic and inappropriate parking, excessive noise from unnecessarily loud PAs on the playing fields, and an increasing imposition on the outlook. I view this statement as part one of a plan to put increasing impositions on the roads encompassed in the statement, with possibly a long view to buying more buildings up. There has been no consideration from this statement on the wider impact Brighton College has on the area of Kempdown in general.</p>
31	Resident	Strongly Disagree	<p>I think the Character statement as a whole is biased towards a Brighton college perspective of the area, on terms that are hugely skewed towards allowing further expansion of Brighton College. When the CCAC Stmt proposes that the "area is not predominantly residential as it is primarily dominated by outward appearance of Brighton College & grounds " this is because Brighton college has been allowed to continuously engage in major building works for over a decade - that has currently culminated in the monumental & overpowering building adj to the lower residential properties of Sutherland Rd.</p>	<p>I think it flies in the Face of the Councils supposed policies on Social cohesion, sustainability & Development control, empowering an organisation that is solely concerned with profit & the interests of a wealthy non resident elite which is seeking to streamline further development that will only create local resentment, additional traffic congestion, pollution, dangerous & arrogant parking as well as overdevelopment of a space that is home to numerous reptile species.</p>

				I find it genuinely staggering that Brighton College is seemingly setting the agenda for continued lop-sided development of an area whilst residents are effectively demoted to second class citizens.
32	Resident	Strongly Disagree		<p>It makes no sense if enhancing character of conservation area has a negative effect on character of kemptown and the character that the residents of all streets purchased their property under.</p> <p>Any further expansion of Brighton College impacts negatively on kemp town character and the residents surrounding the area.</p> <p>Issues as residents we continuously have with expansion are ant social parking, congestion, and danger to our children. There was an incident previously on Sutherland Road where my child was almost run down by a vehicle entering Brighton College for works - this was due to the traffic congestion and chaos that had been resumed by the development process.</p> <p>The impact continuous expansion, works and development has on residents is not only anti social and disturbs the peace - it is dangerous.</p>
33	Resident	Strongly Disagree		<p>It makes no sense if enhancing character of conservation area has a negative effect on character of kemptown and the character that the residents of all streets purchased their property under.</p> <p>Any further expansion of Brighton College impacts negatively on kemp town character and the residents surrounding the area.</p> <p>Issues as residents we continuously have with expansion are ant social parking, congestion, and danger to our children. There was an incident previously on Sutherland Road where my child was almost run down by a vehicle entering Brighton College for works - this was due to the traffic congestion and chaos that had been resumed by the development process.</p> <p>The impact continuous expansion, works and development has on residents is not only anti social and disturbs the peace - it is dangerous.</p>
34	Resident	Strongly Disagree		As local residents Brighton College has brought us nothing but anti-social parking, congestion, and danger to our children. The continual expansion is dominating the area and I absolutely object to any further development. This area is residential - the vast majority of the local residents here do NOT attend Brighton College. The impact continuous expansion, works and development has on residents is not only anti social and disturbs the peace - it is dangerous.
35	Visitor	Neither agree nor disagree	The college have been allowed to throw up a ridiculously overbearing building on Sutherland Road that has a negative impact on the area and particularly residents living on Sutherland Road that have to face the monstrosity! The statement then has the cheek to attack the appearance existing industrial estate and demand constraints are put in place for any future development!!	As above and in addition- The college have been allowed to build a ridiculously slab sided and overbearing building on Sutherland Road that has a negative impact on the area. Most affected are the residents living on Sutherland Road that have to face the monstrosity! The materials used could have provided a contemporary balance to compliment & contrast with the historical materials used elsewhere in

				the college. Sadly the building they have created shows no affinity to the original college and is a complete eyesore that glows at night with light pollution emanating from the translucent pin stripes in the side cladding!!!
36	Resident	Neither agree nor disagree	The buildings along Walpole Rd, Walpole Terrace, and College Terrace should NOT be added to the conservation area.	The statements recommendations focus on 3 issues: (1) missing railings, (2) a wall at the end of Walpole Rd, and (3) the potential re-development of the Woolton building. These are minor and trivial issues compared to the 100s of issues raised by residents, such as anti-social parking, by buses, and private cars, dangerous traffic congestion around Sutherland Rd and Walpole Rd. Access to Brighton college from Walpole Rd to vehicles other than 'emergency access' was supposed to be a temporary measure to allow for heavy goods and construction vehicles. It has now been almost a decade, as each planning application is followed by another one. We have had years of disruption from Brighton college, therefore I would be vehemently opposed to anything that would facilitate or enable further developments by Brighton college into the surrounding area. This is a residential area.
37	Resident	Disagree	The buildings along Walpole Rd, Walpole Terrace, and College Terrace should NOT be added to the conservation area.	Since moving to the area in 2012, the college has been undertaking constant building work. There has not been a single moment in the last 11 years where they have not been destroying or constructing something. Despite all this, the local residents have not been allowed to have the windows to keep them warm in the winter, or a loft conversion to house their families. Every single resident is fed up with being treated as second class citizens whilst Brighton college get free rein to do whatever they like all of the time. Our lives are suffering detriments and we have had enough.
38	Visitor	Strongly Disagree	The needs of the residential areas directly outside the conservation area that will be impacted by any change to use or structure of the conservation area should be addressed.	Statement 2.2 reads as though the area surrounding the college is not residential: Though there is a significant amount of residential terraces in the conservation area its character is not predominantly residential as the area is primarily dominated by the outward appearance of the Brighton College buildings and its grounds. However, the residential buildings that surround much of the college do contribute an urban character that is a significant feature of the environment. I think this is a misleading statement and mis-characterisation of the primary use of the area surrounding the college, which is purely residential.
39	Resident	Strongly Disagree	As a home owner and resident of Sutherland Road for over thirty years I do not wish Sutherland Road to be 'lumped in' with Brighton College who have completely different ideals and motivators to residents.	It is interesting that Brighton College appear to have been consulted but not residents in nearby streets. This is however not uncommon when it comes to the college and their continued expanse into Kempton with no regard for the people who actually live here
40		Strongly Disagree	These are residential buildings and strict planning rules should apply to prevent over planning.	The new building looks like shipping containers and we look at these every day and is an eyesore

			<p>Brighton college have purchased a number of buildings in the Kemp Town area and the renovation works carried out on them is very poor and not in keeping with the area.</p> <p>The new building becomes a lighthouse at 5am and we do not get a good night's sleep, if they leave the lights on all night as this does happen.</p> <p>No concerns of residents are listened to.</p>	<p>If this is the future of a conservation area. The future is looking very bleak for any future planning Brighton college have planned.</p> <p>We are a residential area and wish to remain as such.</p> <p>My family have lived in Sutherland Road for nearly 50 years and before all the building works, the area was residential but since all the building works have been done it is more like an industrial area than a residential area. Especially with all the coaches.</p>
41	Resident	Neither agree nor disagree	<p>These are residential buildings and strict planning rules should apply to prevent over planning.</p>	<p>I appreciate that the College is at the centre of the College Conservation area and as such, plays the predominant role in the Character Statement. However, as much as the College contributes to the local and city economy, it can also detract from the area.</p> <p>For many years, the gates on Walpole Road have seen an endless stream of lorries and commercial vehicles enter for the non-stop development. I do not mind the development, but the dirt, damage and traffic chaos could be reduced. Also, every day in the conservation area when the Prep School finishes, the normally ubiquitous parking wardens disappear and the parents are free to park all over the area, ignoring all parking regulations and basic traffic rules. Will the council be brave enough to ever ask a traffic warden to attend when the school day finishes?</p> <p>I think you need to be stronger in your wording (and subsequent enforcement) relating to 5.2 Negative Development within the Conservation Area. You mention uPVC windows and they look unsightly. A number of properties in Walpole Terrace have just fitted them, including at the front, and the council have done nothing, despite this being against regulations. I can understand that uPVC windows may be allowed at the rear of properties if the windows cannot be seen that clearly. However, in a large block of flats some people just change their windows and doors without even asking for permission. When I raised one such case with the planning office, they just said it's done now so we won't bother. So the moral of the story is why bother with following the rules and spending time and money on planning permission. Just break the rules as the council will not be bothered to take action.</p> <p>If you want to preserve the college conservation area, you need to make it clear everywhere is wooden windows/thin double glazing (as in Edinburgh) etc. Or you cave in and allow anything, to let people improve their energy efficiency. But you must be clear what is allowed and what process must be followed if you want to install uPVC etc.</p>
42	Resident	Strongly Disagree	<p>The buildings along Walpole road, Walpole terrace and college terrace should not be added to the conservation area</p>	<p>The draft character statement is written in a way that is clearly biased towards the interests of Brighton college. It's offensive. I am strongly opposed to any further development by Brighton college. The college is a terrible neighbour, causing daily disruption through illegal traffic</p>

				<p>movements, a decade of continuous building work and building a horrific looking sports and science building that has negatively affected house prices on Sutherland Road. The planning department should be thoroughly ashamed of themselves for not taking a more robust stance against the many planning applications and manoeuvres of the college. The extent to which the planning department acquiesces to the interests of the college suggests that bribery and corruption is at play.</p>
43	Visitor	Agree	<p>Brighton college have purchased a number of buildings in the Kemp Town area and the renovation works carried out on them is very poor and not in keeping with the area.</p>	<p>I live on Sutherland just north of the boundary. I'm concerned that the statement will be used to allow further expansion of Brighton College within the conservation area. As a resident of the area for almost 25 years, I have found the College to be insular and fail to engage with the local community. It's recent expansion has not in my view had any benefits to the local area and in fact has been detrimental by putting pressure on parking, increasing congestion in addition to the disruption, noise and dust from the construction works themselves. I am also concerned that the Statement does not incorporate policy on achieving net zero targets by spelling out how improved insulation, solar panels and low-carbon technology can be retrofitted sensitively. Brighton College is part of the fabric of the local area, but permitting further expansion is to the detriment of the surrounding residential area as well as to the residential component of the Conservation Area.</p>
44	Resident	Strongly Disagree	<p>The whole area is residential! How can they possibly be saying that this area isn't?</p>	
45	Resident	Neither agree nor disagree	<p>The Sports Building on Sutherland Road.</p>	<p>The Sports Building on Sutherland Road. . I fail to see how this complies with the 'special character and appearance of the conservation area'.. . It has caused universal upset amongst residents in the area due to it's industrial -look (grossly out of keeping with the character of its surroundings) and dominating presence in Sutherland road. It's existence, that it received planning permission when area residents have been denied permission to have dormer windows at the rear of their properties, casts doubt on the Council's ability to consistently protect the 'Special character. . . of the area.</p>
46	Resident	Disagree	<p>These are residential buildings and strict planning rules should apply to prevent over planning.</p>	<p>Brighton Council has previously failed to consider, and still does in its current review, the role and importance of integrating the Brighton College Conservation Area within the Brighton Traffic Management Policy. As the college has increasingly grown the local services, amenities and infrastructure have had to bare the weight of this expansion in a negative & uncoordinated fashion to the major determinate of the local residents and the character that Brighton Council wishes to preserve with the conversation area.</p> <p>Two roads inside the conversation area, in particular, are feeling the harmful effects of the lack of a formal and coherent traffic management plan: Walpole Road and Belle Vue Gardens. Both streets are single lane (due to parking) quiet, residential streets and are seeing sustained and daily use by an inordinate amount of large vehicles for</p>

				<p>the transport of pupils to and from the school, mainly private but also some large transports vehicles belonging to Brighton College. This creates chronic traffic congestion twice a day, Monday to Friday on these roads, as well as adding to the burden of traffic on Eastern Road at peak times. Local residents also have to deal with persistent anti-social parking behaviour from the owners of these vehicles, who are consistently illegally parking in permitted parking zones to the expense of local residents who have to park further away from their own properties during these periods.</p> <p>Simultaneously, as the residents are dealing with the negative impact of public traffic, there is the steady flow of HGV's and professional trade vehicles using Walpole Road, on a daily basis, to enter the construction site via an access gate. The access gate was only supposed to be a temporary measure but with the lack of traffic planning management considered for the conservation area, and previously planning applications, this has now, essentially, become a permanent blight to the road and conservation area.</p> <p>With the combined, and inappropriate, daily use of roads within the conservation area by HGV's and large, polluting SUV's private transports vehicles (weighing in excess of 2k KG) there are obvious and imperative road safety, noise pollution and air quality issues to be addressed. Brighton Council's own policy's, as set out in the report of March 2023 by the council's own Environment, Transport & Sustainability Committee "2023/2024 Local Transport Plan Capital Programme" is for a sustainable, socially cohesive traffic policy that focuses on the safety and well being of the local community. We are currently experience the opposite of this and the conservation area review is the perfect time to realign on this inconsistency.</p> <p>With the possibility of further and continuous redevelopment of the Brighton College site there needs to be a more appropriate framework put into place, such as the utilisation of Sutherland Road by HGV's for access to current and future construction sites. Sutherland Road is a much wider, more accessible route for larger goods traffic with existing use by similar vehicles entering the Fresh Field Business Park, as well as lack of residential housing in the vicinity posing significantly less health and safety risks. Brighton College should also be asked to consider investing in the development of its own parking infrastructure to deal with the increase in traffic or to instigate measures to lower parent vehicle usage to the betterment of air quality and local well-being in a meaningful way. Brighton Council should also be monitoring and enforcing any violations to curb this antisocial behaviour - this has been noticeable and remarkably lacking.</p> <p>If none of these measures are taken then Brighton Council could potentially be considered in breach of its responsibilities in enforcing</p>
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				<p>the character and historical integrity of the conservation area, as it should under section 72 of the Planning Act, in addition to failing to administer its own transport and traffic management policies. This should be coordinated along with the amount of parking permitted Brighton College is being issued which clearly adds to the burden of the local parking infrastructure. Therefore I request that Brighton Council coordinates with the ETS Committee to consider the issues raised as part of the conversation area review.</p> <p>I have a portfolio of photographic evidence to outline the traffic, road safety and pollution issues I have raised and the residents face on a daily basis.</p>
47	Visitor	Agree		
48	Resident	Disagree	<p>I believe that the streets surrounding Brighton College should be taken out of the conservation area, leaving the college buildings alone inside the conservation area.</p> <p>Specifically - Sutherland Road, Belle Vue Gardens, Canning Street, College Terrace, Walpole Road, Walpole Terrace and Hendon Street should not be included.</p>	<p>I feel that the character statement is very heavily biased towards Brighton College and some rather minor repairs.</p> <p>The main issues which residents want addressed are anti-social parking, traffic congestion, and the noise and inconvenience of the seemingly continual development of the college site.</p> <p>The statement also doesn't take into account how the character of the conservation area impacts on the rest of Kemptown which is mostly residential.</p> <p>Residents are very concerned that Brighton College will be able to continue to develop and expand which will further impact our living environment and the character of Kemptown as a whole, of which Brighton College is still only a small part.</p>
49	Resident	Disagree	<p>I feel that the character statement is very heavily biased towards Brighton College and some rather minor repairs.</p>	<p>I feel that the character statement is very heavily biased towards Brighton College and some rather minor repairs.</p>
50	Resident	Agree		<p>Brighton College is not taking the local community serious at all. With double parking, coaches parking side by side making it very dangerous they have ruined the roads and the look around the college. The works being carried out have been very disruptive and do NOT look in keeping with the beautiful surroundings. The head has not communicated with the students and parents about respecting the houses around as people wait in their cars for hours with engines running to collect their children. The coaches that park up for hours on end with drivers smoking and dropping cigarettes has also made the whole area shabby and dirty to look at. The building need to have some respect for the local area and businesses, and there has been no compensation to the houses directly opposite for the noise, parking and disruptions they have all had to put up with. Getting out of the street at 8.15 am is like tiring to crawl through mud as people are parking everywhere blocking roads and corners and equally after school it is worse, especially in the dark. The college has brought many buildings in the area, even houses to house there students and</p>

				<p>the feeling of good neighbours is slowly going away when you have youngsters coming and going all day long and through the night. Living close to it and the look of it when I moved here 15 years ago, I was so happy to live next to such a green space with beautiful looks around. Now I want to leave, as this is all being taken away with the amount of cars daily, the parking, new buildings that don't fit in with the surroundings and students moving into many buildings in and around the area that has taken away that neighbourly feeling we used to have. It feels like there is no regard for the local community, and they get special treatment from the council re planning, removal of the permit signs so their buses can park. Bollards are put up during school opening and closing and we're told when we pull up to our own houses these are for coaches?</p> <p>The view has changed so much and at present all we look at is porter cabins.</p> <p>The school seems to have no consideration whatsoever for the local community, and therefore if anything can be done to stem there growth anywhere other than within their own boundaries, then Kempton and the surrounding area will no doubt Change forever.</p>
51	Resident	Strongly Disagree	All streets should be removed from the college conservation area. The college should be in its own conservation area with in its grounds. The surrounding streets should be in their own conservation area. The college should stop encroaching on the community.	<p>The surrounding streets are made up of lovely houses (not many two story houses, as was wrongly stated). None of the houses in this area have a view of the front of the college. Houses in Canning St can't even see the college!</p> <p>It seems to have been proposed by someone in the pocket of the college! Is this right? Is this being raised now because they tried to circumvent planning permission by turning houses into a massive student dormitory?</p>
52	Resident	Strongly Disagree	I believe it incorrectly addresses the buildings in the area.	<p>I have a number of complaints and queries regarding the character statement.</p> <p>1- I do not understand why this character statement has been produced at this point? There are no proposed changes to the conservation area which has been in existence since 1988 so what is the need for the statement?</p> <p>2- the consultation has been very badly managed. There were a couple of discrete signs on lampposts that would easily be missed. Why have we not been leafleted to inform us more clearly of the consultation?</p> <p>3- I believe that the character statement is incredibly biased towards Brighton College and dramatically diminishes the huge significance of the residential housing in the CCA.</p> <p>4- the residential area in the CCA is a strong and vibrant community. We have a strong arts presence with Artists Open Houses in a number of houses within the CCA. Canning Street has an annual street party and Christmas window advent which pulls the community together. I do not believe that Brighton College is the significant feature of the conservation area.</p>

				<p>5- the vast majority of houses on Canning Street are 3 storey with a number being 4 and a few 5 storey. The character statement refers to the street as 2 storey which is minimising in terms of impact of the street.</p> <p>6- there is a strong historical element to the statement implying we should be pleased to live near the College which has been here so much longer than us- I do not believe this is true.</p> <p>7- there is discussion of the unsightliness of the Freshfield Estate which borders the conservation area. There is no discussion of the unsightly new building on Sutherland Road (sports and science) which I believe is contrary to the ethos of the conservation area.</p> <p>8- there is no discussion of how Brighton College has been able to buy local residential houses and turn them into business property. I believe that this is also counter to the CCA and should not be allowed.</p> <p>9-it is difficult not to draw a conclusion that the character statement has been produced at this time when as local residents we are aware that the college has been refused permission to knock through the 3 houses on Walpole Road which they have purchased. It therefore appears to me that someone would like us to agree the statement so that Brighton College can continue to encroach on the local residential community which I am vehemently against.</p>
53	Resident	Neither agree nor disagree		<p>It's not clear what the purpose of this statement is. A notice was placed at the other end of our street tied to a lamppost that a resident happened to notice and let more of us know.</p> <p>We are left wondering why this is being raised now?</p> <p>There is a lack of clarity as to it's possible importance.</p> <p>It did seem rather that Canning Street was an insignificant bit part player but in fact we have a vibrant helpful community we have built up that attract people to live here.</p> <p>But if this is merely an observation of architecture we feel that could have been explained a lot better.</p> <p>This household wants to stay in the conservation area because we like the protection from additions to property not in keeping with the area.</p> <p>But there is confusion over what being in the conservation area means. We think that would have been a great starting point.</p>
54	Resident	Disagree	<p>I think this cannot be decided by a survey but needs to be discussed in a public meeting where the aims and objectives of Character Statement are explained and open to questions and then the boundary of the conversation area can be more accurately assessed and decided.</p> <p>It currently feels as a College dominated Conservation Area with a few token streets around it and indeed the wording "its character is not predominantly residential" is somewhat alarming to those of us who consider it is residential but observe the gradual take over of residential houses by the College and wonder therefore is this an attempt to assimilate the designated boundary area as ultimately all belonging to and being to the service of Brighton College. If so, limit the boundary to the current footprint of Brighton College itself or expand the</p>	<p>Although the history is interesting it reads as a biased account of the character of the CCA that leaves us feeling it is serving the interests of the College itself and indeed smoothing the way for the continuing development & expansion of the College, regardless of the views of local residents.</p> <p>The majority of time we have lived here we have endured one construction project after another with token consultation (we have observed ground work commence before planning permission provided) and lived with the associated noise, heavy goods and construction vehicles around local streets.</p> <p>The statement recommendations do not reference the anti-social parking I experience on every school day or the twice daily traffic congestion or closure of pavements for a considerable period.</p>

			boundary to include the wider area of residential streets and think about the character of the larger Kemptown area of which it forms part?	<p>Currently aware of the take over of 8 - 12 Walpole Road and further removal of general housing stock.</p> <p>Their website proudly states "We're also committed to making sure a connection to community is central to College life" however, i have seen any example of this or experienced any direct engagement or indeed any invite to visit the campus.</p> <p>So please talk direct to us local residents, let's hear from our councillors and school officials in an open face to face meeting and reveal the next '10 year plan' and what that actually means for us in reality.</p>
55	Business visitor	Strongly Disagree		<p>Brighton College Conservation Area Appraisal Public Consultation Response</p> <p>We are writing on behalf of our client, Brighton College, in response to a public consultation on the Draft Brighton College Conservation Area Appraisal, the first such a document to be produced since the area's designation in 1988.</p> <p>In this letter, we raise some of our initial concerns with the draft document and the analytical process which has contributed to it. It is unfortunate that the appraisal has been carried out without any prior input having been sought from the College or ourselves. The College represents the significant majority of the Conservation Area (CA) and has an archivist with historical records that could significantly inform any assessment. In addition to the historic detail, the College also has details of the new facilities that have been introduced in recent years (many of which have won architectural awards). All of this could have been used to help an assessment. Due to a lack of consultation time, this letter provides initial detailed feedback on the draft document but there is significant additional value that could be obtained for the Council and for occupants of the CA from a collaborative approach with the College.</p> <p>We believe the document requires substantial alteration and much additional analysis before it reaches a conclusion and we would recommend this document has a second round of public consultation after our comments have been considered.</p> <p>We seek a meeting with yourselves to discuss the document and to establish a working relationship between Brighton College and the Council's conservation team. We would like to collaborate to ensure this is a useful, positive document for all those that use it.</p> <p>Detailed Comments</p> <p>The document has serious quality issues which need to be addressed for it to be used effectively in managing change within the conservation area so as to ensure that its character and appearance is preserved and enhanced. Brighton College wants this document to be genuinely helpful in how it manages and guides the future enhancement of the area and believes that this must be supported by clear-minded, robust, and accurately recorded assessments of the existing character and</p>

				<p>appearance and the special interest of the area. At present, the document fails to sufficiently appraise the conservation area, and this appears to be the result, in part, of inadequate adherence to methodologies and business writing standards.</p> <p>Structure and content</p> <p>Whilst there is no set structure which an appraisal must follow, there are reasonable expectations that certain aspects of the character and appearance of a place will be included. Historic England's Conservation Area Appraisal, Designation and Management (2019) advice note provides the clearest guidance for the production of such documents. It should be used as a guide, rather than a set template, as to what might be expected to be included. Whilst we do not believe that an appraisal must follow the set categories of Section 4 of this document, it does provide a useful starting point for what aspects of character and appearance should be assessed.</p> <p>In this respect, we do not believe that this appraisal includes all the necessary content. In particular, there is a clear lack of Spatial and Townscape analysis. This omission is further highlighted by the 'Appraisal' section failing to include much analysis, and veering towards description rather than assessment.</p> <p>Particular comments on structure and content:</p> <ul style="list-style-type: none"> • Paragraph numbers should be used so the document can be cross-referenced; this has been done inconsistently or not at all; • Figure numbers and captions should be used so images can be cross-referenced; • Section 1 'Purpose', sets out the overall context. This is sufficient but some wording needs to be clarified as highlighted in the attached version. Appendix B is noted but perhaps more clarity is required as to the status of the document in relation to the Local Plan. • Section 2 'The Conservation Area' includes several sub-headings such as 'Building Materials', 'Appearance and Views' and 'Buildings and Archaeology'. It is not clear what the purpose of these sections are as they are not included within the Appraisal section itself, but only in this preliminary descriptive section. It would make more sense if categories such as this were included within the main appraisal. Further to this, categories such as 'Building Materials' are better situated within a broader category or description of architectural style as a whole. 'Appearance and Views' also does not appear to work well as a category as it is unclear what 'Appearance' in this context is referring to, and the section appears to focus on Views analysis. The draft appraisal should have closer regard to the Historic England categories such as 'Architectural interest and built form', 'Spatial analysis', 'Setting and views' etc. • Section 3 'History', is broadly sufficient but regard should be had to our detailed document comments. • Section 4 'Appraisal', is particularly deficient in terms of its structure and content. As set out above, this appraisal is the
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				<p>fundamental part of the document and rather than describing the area in general with only one sub-category 'Boundaries, green landscaping, and trees', the introduction of further sub-headings would bring some methodological rigour to the analysis, for example, Historic England categories such as 'Architectural interest and built form', 'Spatial analysis', 'Setting and views' etc. Without these categories the assessment misses out much important analysis, particularly of historic interest, character areas, architectural character, spatial qualities, townscape character, and the contribution of open spaces. The existing summary description fails to include much of this analysis.</p> <ul style="list-style-type: none"> • Section 5 'Pressures for Change and Opportunities for Enhancement': further to our detailed document comments, it appears much of what is written within 5.2 'Negative development within the conservation area' should be included within the Appraisal itself, and this section should identify or summarise key patterns of change. <p>Quality issues</p> <p>There are a significant number of instances within the document in which sentences have poor syntax. This makes the author's substantive intention confused and/or difficult to read. This problem extends throughout the document. Whilst this response outlines many areas in which syntax is an issue, there are many other instances where we would welcome edits.</p> <p>Issues with analysis</p> <p>2.2 Summary of the area's Special Interest and Character</p> <p>This section begins by describing the CA as having a significant number of residential terraces, before establishing that Brighton College 'dominates' by its outward appearance. The sequence of description here makes an unclear point. The CA is called Brighton College Conservation Area and was clearly designated due to the quality and significance of the campus buildings, as well as the positive contribution which the nearby terraces make to the setting of the campus and vice-versa. This central point is left un-said. The second sentence further establishes a focus within the assessment on the surrounding terraces, and not the college itself. We recommend this be re-written with the appropriate focus.</p> <p>This wrong-footed assessment continues with the assertion that because the college buildings are inward looking, 'the terraced housing, with its most significant features built around the highway frontages has a very significant and positive impact on the streetscape, especially onto the north and east views within the conservation area.'</p> <p>This is a strange conclusion and again largely ignores the significant positive contribution which the listed and contemporary buildings of the campus make towards the conservation area, and exaggerates the importance of the relatively standard C19th-century housing, which owe much of their significance to their setting in relation to the college. This assessment appears to be misguided and appears to suggest that the housing has a greater positive effect on the character of the CA, than the nationally significant listed buildings. This assessment</p>
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				<p>appears to fundamentally mis-understand the special interest of the conservation area.</p> <p>In relation to this residential housing, the appraisal fails to assess their architectural or historic interest, or to interrogate where their value derives from in relation to their spatial/townscape quality of their group value with the college campus. They are asserted as being 'significant' with little written underlying evidence to assert this. Whilst they do of course make a contribution to the conservation area, their specific interest or character has not been successfully established within this document.</p> <p>The second last paragraph of this section includes the phrase 'the townscape is dominated by the substantial school building.,' This is an incorrect use of the word 'dominated' where the area is primarily made up of school buildings. This paragraph also refers to a 'listed façade' which is a serious error as the entire building is listed and this description undermines the council's statutory duty.</p> <p>On this point, the document's lack of description of the designated listed buildings within the conservation area, and the specific failure to reference these within the summary of Special Interest, appears to be a serious omission.</p> <p>Section 34, page 15, of Historic England's guidance sets out clear elements which need to be considered when defining the special interest of a place. We recommend that this best practice document is used in supporting a more coherent re-formulating of the appraisal.</p> <p>2.3 Building Materials</p> <p>This section tries to summarise the materials of both the college buildings and the residential buildings in a short sentence. It would be better to separate these two character areas for ease of use. As set out above, this section should be included within the Appraisal and be part of an overall look at built form and architectural style. Images are necessary here. Joinery, roof materials, boundaries and other details have been omitted. At present this section is too short to be useful and should be expanded and illustrated within the main appraisal.</p> <p>2.4 Appearance and Views</p> <p>As set out above, this section should be included within the main Appraisal. It does not properly describe the views and the syntax of many sentences confuses the assessment. The inclusion of 'Appearance' in the title does not clearly relate to the content.</p> <ul style="list-style-type: none"> • Views along Eastern Road are not described; • View north on College Road does not have the framing residential street described, only the school itself; • Views north on Walpole Road showing the side of the college should be described; • The description of the views of Carlton Terrace and Walpole Terrace entirely omits the importance of their spatial/townscape position and the ability to view these terraces across the College grounds. The fact that these terraces are single-sided and prominent should be included in the description of views;
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				<ul style="list-style-type: none"> • There needs to be an overall description of to what extent these views contribute to the special interest, which are more important, and which are less. <p>2.5 Buildings and Archaeology This section is unclear. It does not comprise a buildings audit nor does it list the designated heritage assets.</p> <p>3.1 Origins and historic development The history of the development of Brighton College is deficient and does not appear to include enough detail on the development of the listed buildings which are the most important parts of the conservation area. There is insufficient understanding of the area's wider historic development and more of this should be added as important context for the development of the CA. There are many syntax errors within this section which limits understanding and readability.</p> <p>3.2 and 3.3 These sections could be amalgamated and expanded. Further understanding of the development of the CA's setting would be helpful.</p> <p>4. Appraisal 4.1 Brighton College There are several errors of syntax, beginning with the first sentence, which confuse the assessment and make readability difficult. The second paragraph description of the Gilbert Scott buildings makes an unreasonably negative assessment of their contribution. Whilst comparative analysis is important, the buildings are still of special architectural and historic interest and make a significantly positive contribution to the character and appearance of the CA. The appraisal fails to conclude or assess this contribution. The dining hall is mentioned but only in descriptive terms and its status as a listed building of special architectural and historic interest not mentioned. The paragraph beginning 'The Eastern Road frontage...' contains many syntax errors and should be rewritten. Mention of the 'listed frontage' should be re-worded to avoid confusion. Considering the Eastern Road Jackson building is clearly the most highly visible part of the conservation area, and a significant positive contributor and key part of its special interest, the appraisal fails to include any of this kind of assessment. The highly successful clock tower restoration is uncelebrated and merely described, where this could be an opportunity to draw attention to successful conservation work. The description of the Allies and Morrison block as a 'sympathetic, but contemporary addition,' appears to present a dichotomy when one does not exist. We would expect these high quality modern buildings to be accurately appraised and described as successful examples of good, contextual architectural design in a sensitive heritage context. The word 'sympathetic' does not do justice to the evident success of this design quality.</p>
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				<p>This section describes and does not appraise. Where is the special interest within these elements? How do they contribute to character and significance?</p> <p>Whilst we accept the rendered wall along Walpole Road is a detractor, 'bleak' should be replaced with a less emotive word.</p> <p>5.1 Pressures for change</p> <p>The phrase 'The contribution the school makes to the conservation area with its sympathetic architectural developments and the landscape and boundaries are likely to have a significant impact of the historic significance of the environment,' should be re-written to avoid stating that an impact on historic significance is inevitable. Whilst historic significance may be affected going forward, much successful development can come forward within a CA without affecting it, or affecting it positively. It would be better to re-phrase this statement in these terms.</p> <p>The second part: 'Therefore, it will be important that further development be assessed in the context of the conservation area's character and successful new developments such as the new accommodation block on the junction of Eastern Road and Walpole Road put forward rather than buildings which are out of character such as the arts building on the junction of Eastern Road with Southerland Road.' This sentence should be re-written to tease out what makes some development successful and others not. Simply referring to un-illustrated examples is unhelpful without explaining and showing which aspects of the design is succeeding. Work should be done to analyse what has been successful within the CA and for this to be properly articulated.</p> <p>5.2 Negative development within the Conservation Area</p> <p>We would suggest that restricting any dormers or rooflights on front elevations is too restrictive given the existing examples and the limited visibility of these roof slopes. We suggest guidance which allows traditionally detailed, appropriately scaled dormers, and single conservation rooflights of an appropriate size. This strikes the right balance between creating much needed usable space within the lofts and preserves the existing character and appearance of the conservation area.</p> <p>An Article 4 directive is mentioned but this is entirely unexplained. Firstly, for most readers or users of this document, this is not helpful. Secondly, there is no suggestion as what threats to the character and appearance of the conservation area the Article 4 direction might control, or what might be included within the direction. Any direction should be supported with evidence. We suggest that the council omits any mention of an Article 4 direction until it has developed its strategy regarding it and collected evidence based on robust analysis.</p> <p>This section describes some nearby buildings as 'rather bleak housing developments'. We believe it is highly inappropriate for the council to use such emotive, negative language about people's homes.</p> <p>5.2 Opportunities for Enhancement</p>
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				<p>The description of the boundary wall along Walpole Road as 'brutal' should be changed for a less emotive word. Although we do accept there is scope for enhancement.</p> <p>'Future development by Brighton College to revisit architecture of the Woolton building to resolve its negative and discordant impact would be encouraged with more positive contemporary development,' is a confusing statement as the phrase 'more positive contemporary development' seems specific whereas the document should simply encourage good quality design and architecture.</p> <p>We trust that these comments are useful and will helpfully inform the next iteration of the Conservation Area Appraisal. Given the extent of changes considered necessary we would recommend that the Council further consults again on the next version of the Conservation Area Appraisal. As explained above, we would like to collaborate to ensure this is a useful, positive document for all those that use it and as such, we would welcome a meeting to discuss our feedback.</p>
56	Resident	Disagree	Canning Street. (It is very hard to make an informed decision but on balance we think we would prefer for our street, Canning Street, to be removed from the conservation area for the reasons given below.)	<p>We share many of the concerns of our neighbours who live within the conservation area, particularly in relation to the egregious developments on the Brighton College site in recent years, and the College's disgraceful attitude towards the local community. We have read some of the statements and letters to councillors written by our neighbours and we agree wholeheartedly with their concerns.</p> <p>We have little to add, except that we are especially concerned at the reference to refusing future applications for loft conversions on Canning Street. We would accept that front dormers might affect the character of the street but more rooflights (and rear dormers) would have no adverse affect. Residents should have the ability to make reasonable adaptations to their properties and for a family such as ours with young children, the possibility of a loft conversion may enable us to stay in the area rather than having to move away having built our lives here.</p> <p>In the context of Brighton College's antisocial behaviour and some of the monstrosities they have been allowed to build in recent years, it feels insulting for a resident to be told that they can't convert their loft or replace their windows.</p>
57	Resident	Disagree		<p>The CCA Character Statement consultation process leaves much to be desired. A4 notices attached to lampposts are the minimum the council is required to do, and as a resident, I would welcome a more robust and transparent means of seeking opinions (emails and/or notices through letterboxes would have been more encouraging). This is disappointing and makes one wonder if they were designed to go unnoticed.</p> <p>The statement itself underplays the importance of the residential areas, and while these are smaller in terms of square metres than the</p>

				<p>occupancy of Brighton College, they nevertheless add considerably more by way of local community and qualitative experience as a neighbourhood. A statement that more adequately reflects the local environs and its people would make for a more rounded picture.</p> <p>I have answered 'yes' to question no 3, but I do so with some reservations. I don't know if this is best for the residents of this area or if this gives power and leverage to the College and its expansion.</p> <p>When I first moved into Canning Street 25 years ago, I welcomed Brighton College, opening its facilities for swimming, sports, ballet, etc, to the community for a few hours each week. This kind of inclusive public access felt like you were part of the wider community and went some way to engaging local people.</p>
58	Resident	Disagree		<p>There is a large imbalance in the statement which seems biased in favour of Brighton College compared to local residents who were also not adequately informed about the CCA statement, a letter should have been posted through everybody's letterbox and not stuck on a couple of lamp posts. I do not agree with the statement that the conservation area should be classified as predominantly business, Brighton College may have a larger footprint than the included roads but the fact that those roads have houses that are occupied by people for more time than the college building are should count for something. My decision for the road that I live on to remain in the conservation area is based on the fact that I do not want the number of residential streets in the conservation area to decrease which would give the appearance that the CCA is more business than residential. Brighton College also at one time made their sports facilities available to the local residents and this inclusivity has been denied us for a number of years. I hope by keeping as many residential streets in the CCA that we have a stronger case for making any possible challenges to any future inappropriate developments and not the reverse, that being in a business conservation area it allows Brighton College to run rough shod over the residential community.</p>
59	Resident	Disagree	<p>I think that the conservation area should be extended to reflect the 'natural neighbourhood' community of the conservation area around Brighton College.....and not just the immediate area defined as around Brighton College! I think the following parts of our 'natural neighbourhood' should be added in, including:</p> <ul style="list-style-type: none"> - The other 'Baker's Bottom' Streets ie Hendon Street, Bute Street and Rochester Street - Freshfield Road, to the level of Queen's Park Terrace/Cuthbert Road; ie joining our conservation area up to Queen's Park Conservation area 	<p>6.1 BUZZ BINGO HALL</p> <p>There is no mention at all of the 'Buzz Bingo Hall' which takes up a very substantial area and dominates on the corner of Eastern Road and Sutherland Road....to the South west of our/the College Conservation Area.</p> <p>In my view, the Bingo Hall is much more of an eyesore and mismatch to our Conservation Area than the Freshfield Business Park. The Freshfield Business Park is, at least, tucked away at a lower level along Sutherland Road, and this Business Park could be easily further camouflaged by more and higher level and more interesting tree planting along its boundaries, including at the bottom of Sutherland Road. The Business Park is also, in a way, in tune with the former</p>

			- All of the streets connecting Freshfield Road to Sutherland Road; up to the level of the top of the Baker's Bottom streets; ie: Cuthbert Road, Evelyn Terrace and Freshfield Way	<p>Kemp Town Railway Station that previously occupied, and is part of the history of, that space!</p> <p>6.2 DESCRIPTION OF CANNING STREET</p> <p>The character statement is also incorrect in relation to its description of Canning Street, where I have lived for over 23 years! Canning Street is described as "... with 2 storey late nineteenth century houses on both sides". In fact, the vast majority of the terrace houses are either 3 or 4 stories, into very functional basements below street levels (NOT including attic conversions). Travelling from the east to the west end of the Street, only a few houses at the east end of the street are 2 story; eg on the north side of the Street there are just 5 only 2 storey houses from no. 45 to 53 inclusive.</p>
60	Resident	Strongly Disagree	Canning Street (see comments below)	<p>The College Conservation Area Character Statement (the Statement) presents what many will find an interesting history of the development of the College and the surrounding streets. It is intended to be more than this, however. Its primary purpose is said to be to assist and guide the development of the area and provide the Council with a framework for assessing future planning proposals. The National Planning Policy Framework further states that such a Statement should offer a positive strategy for the conservation and enjoyment of the historic environment ...'.</p> <p>Does the Statement succeed in this aim? It is offered to the public as a draft for comment and it would, in this commentator's view, be useful if it went through a further draft stage and received further comment before final approval.</p> <p>The statement makes two kinds of assertions about the built environment of the College (walls and fences in addition to buildings).</p> <p>In the case of College buildings (apart from those that are listed), it offers a value judgement about almost every one. Those of the latter part of the twentieth century are variously 'less positive', 'bleak' and 'anachronistic'. On the other hand, those built this century are assessed more positively. Yet oddly, the recently completed Science and Sports Centre is mentioned without judgement at all. While other buildings are criticised for their anachronism, nothing is said about this, the most anachronistic of all. This is not to criticise the building, it's fine in its way; but in a document that purports to set out principles of conservation, what exactly has been conserved by the Sports and Science building? Architectural excellence perhaps? It has to be remembered though that all the negatively appraised buildings were at one time commissioned (and presumably admired) by Brighton College and approved by the Council's Planning Department in the light of, among other things, the College Conservation Area Plan existing at the time.</p>

				<p>What then, is being achieved in this part of the Statement? In reading the author's appraisal of the College's buildings the reader is left with the impression that those buildings the College wishes to demolish in furtherance of its future development plans have been singled out for a negative appraisal so that any plan to redevelop them can be presented as removing an eyesore. The Council should consider the possibility of such an agenda before giving this Statement its approval.</p> <p>In the case of the residential buildings within the area, the Statement singles out three kinds of improvement for possible prohibition that owners have made or might want to make to their houses.</p> <ol style="list-style-type: none"> 1. Dormer windows. The statement refers to a dormer window on a house in Walpole Road. There is one on number 20, but this is original. It seems unlikely that many visitors or residents spend time looking at the roofs of houses in this area. However, small, well-designed dormers of a consistent size and placement would surely be possible? 2. Rooflights. Two houses in Walpole Road have rooflights. The Council's Planning Department recently turned down an application to amalgamate numbers 8, 10 and 12. It is important to note however that when doing so the Department did not refuse the applicant's request to have rooflights in all three houses. It would seem that in the case of rooflights (hardly a visual blight), the horse has already bolted. 3. uPVC windows. This respondent's preference is for wooden windows, but it is true that modern uPVC windows can be bought that look like timber. It is perhaps with these in mind that the Council's Planning Department approved an application to install uPVC windows at the front of a house in Walpole Terrace on the 17th October 2023 (BH2023/02102). <p>Has the Planning Department been consulted in the preparation of this Statement?</p> <p>The prohibitions listed above, should, the Statement suggests, apply to the whole Conservation Area. This raises the question of why Canning Street should be included at all? The houses in this street are not visible from any College building and neither can the residents of Canning Street see any of the College. One should be mindful of the National Planning Policy Framework's injunction to 'ensure that [...] the concept of conservation is not devalued through the designation of areas that lack special interest'. If Canning Street is of special interest, why not Hendon Street, then Bute Street and so on?</p> <p>To sum up, if there are any principles or guidelines that should shape the development of College buildings they should appear in this</p>
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				Statement. And if the Council is to prescribe what alterations to the frontage of their houses residents may make, it should bear in mind what has already been approved and be prepared to deal with the charge of inconsistency.
61	Resident	Agree	I believe College Terrace, Walpole Terrace, Walpole Road, Sutherland Road and Canning Street should be removed from the conservation area as they have a residential character which is more in keeping with the surrounding Kemptown village area. The College itself is obviously unique and therefore it's design, styling, etc. should be restricted to the existing College grounds and should not be permitted to spread beyond the current boundaries.	As stated above the College has it's own unique character and should not unduly influence the surrounding residential area. The current and seemingly unending development at the College is having a negative impact on the residents of the area. The traffic congestion and difficulty of access to Eastern Road and Sutherland Road during the day, particularly in the morning, caused by parental traffic and buses delivering pupils to the College is further exacerbated by the heavy vehicles needing access to the ongoing works on the College grounds via Walpole Road. It seems that the College is allowed to continue to develop without regard to the unique residential character of the rest of the conservation area especially College Terrace, Walpole Terrace and Walpole Road.
62	Resident	Neither agree nor disagree		Brighton College should not be allowed to acquire more houses and community buildings into their exclusive private use. There are insufficient local houses for families already
63	Resident	Strongly Disagree	I feel that the Preparatory School and the unlisted Walpole Road residential properties, should be removed from the conservation area, as should Canning Street. The Prep School is an unattractive series of buildings, whilst Walpole Road (disincluded on historic grounds) includes College property - should this be included within the conservation area simply because of College ownership? And likewise should Canning Street be included when the reason for its inclusion is its connection to the Metway building.	As a near-neighbour to the College, one has cause for concern that by establishing a conservation area beyond the school's physical boundaries you offer approval for expansion into the residential adjuncts. Furthermore, the draft Character Statement over-represents the historical importance of the College and actively marginalises the residential composition of the neighbourhood. Furthermore it seems to support and promote the College's right to develop within its boundaries; personally speaking, I see only negatives to the school's continued and unrelenting development, and without access to its historic landmark buildings, I perceive no benefits.
64	Resident	Neither agree nor disagree	The conservation area's boundaries ought to be extended to include all of Hendon Street, Livingstone Street, Bute Street and Rochester Street, as well as both sides of Sutherland Road south of where it meets Dawson Terrace. In this way the conservation area would include some of the earliest buildings in the immediate area and be congruent with the historic Baker's Bottom furlong, which has long defined the area's development and character.	Yes: the claim made in 2.2, "the conservation area[s] character is not predominantly residential", is erroneous. As the same paragraph goes on to the acknowledge, most of Brighton College's building are inward-facing: many are not even visible from outside its grounds. Except for facade on Eastern Road, and the very unappealing lower end of Sutherland Road, all public rights of way within the conservation area are dominated by residential building. Thus the draft conservation statement should be amended to assert the area's predominantly residential character.
65	County Archaeologist		No comment	
66	Historic England			Historic England welcomes the Council's production of this document, which should assist the positive management of the local historic environment, whilst ensuring this is integrated with wider planning strategies and policies.

				<p>1.0 Introduction We would recommend the inclusion of an introduction, as an opening paragraph in the draft conservation area appraisal. This should include the sections already provided concerning the purpose of designation, as well as legislation and policy context (§1.1-1.3) and add new sections regarding the appraisal methodology and the public consultation that has been carried out.</p> <p>2.2 Statement of the Area's Special Interest and Character We suggest subdividing this paragraph into two. The first, titled 'Statement of Special Interest' should provide clear and immediate information about what is significant about the conservation area in terms of history, appearance, character and setting. As such, it would benefit from a more succinct format and the use of bullet points for highlighting the key elements which contribute to the special interest of the area. It would be more appropriate to place detailed information currently included in the draft summary into relevant sections within the main body of the document, where more exhaustive details on specific topics could be found. The second paragraph titled 'Character Assessment of College Conservation Area' would be better placed after paragraph 4.0: 'Historic Development', as it is informed by and cross-referenced to analyses provided there. This paragraph should consider the character of the conservation area as a whole, covering different aspects including spatial analysis, materials and architectural details, public realm, important views, setting, and audit of heritage assets. As such, the 'Building Materials', 'Appearance and Views' and 'Buildings and Archaeology', currently arranged as separate sections at point 2.3, 2.4 and 2.5 of the current draft document, should be included as subparagraphs within the 'Character Assessment' paragraph. In terms of important views, we welcome their inclusion within the draft conservation</p>
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				<p>area. However, it would useful if they were also represented by arrows on an appraisal map, alongside photographs.</p> <p>In addition, when describing views, special attention should be given to identifying heritage qualities and sensitivities, such as if any new development would cause harm by breaking above the roofline silhouette of any buildings or landscape features.</p> <p>With reference to the Audit of Heritage Assets, this should form a new subparagraph.</p> <p>The draft document has opportunely identified designated and non-designated heritage assets which make a positive contribution to the conservation area on a relevant map. However, it would be appropriate to list identified non-designated heritage assets and indicate their significance and justification for their inclusion, which would ensure their qualities are fully explained and transparent. It may be advisable to consider identifying also those buildings and spaces that detract from the conservation area on an appraisal map and describe them in a relevant subparagraph. As with positive contributors, the reasons why these buildings or spaces are detractors should be clearly identified.</p> <p>5.0 Pressures for Change and Opportunities for Enhancement</p> <p>This paragraph could be extended to form a proper management plan in order to set out a positive strategy to prevent further erosion of the conservation area's interest.</p> <p>Accordingly, a more detailed analysis of the conservation area's condition, setting out the strengths, weakness, opportunities and threats of the area should be provided.</p> <p>This will help summarise the main issues within the conservation area and provide the basis for setting out the core principles of the management plan. This in turn can channel development whilst avoiding, minimising and mitigating identified negative impacts affecting the area.</p> <p>Presenting photographs showing examples of the negative impacts threatening the conservation area special interest would furthermore help to inform building owners</p>
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				<p>and potential applicants on the management of their property, as well as provide a guide for future monitoring and enforcement.</p> <p>The following list of topics can provide suggestions for the structure of this section:</p> <ul style="list-style-type: none"> - Condition of the Conservation Area • Strengthens • Weakness • Opportunities • Threats - Management Principles - Advice on Conservation and Repairs - Making Changes to Buildings (alteration, extension and demolition): • Alterations in response to climate change • Boundary treatments • Unsympathetic modern additions • Windows, doors and drainage goods - Making Changes to Public Realm Features and Finishes - New Development within the Conservation Area <p>This structure would help address specific issues identified in the appraisal process.</p> <p>It would also be beneficial to include detailed design guidelines in response to, for example, replacement windows and doors.</p> <p>Recommendation</p> <p>Historic England supports the production of this statement and the associated management plan for the College Conservation Area. However, we recommend your Council takes the necessary steps to address the points made above to ensure the statements will facilitate sustainable development, as set out in the NPPF.</p> <p>If this Conservation Area Appraisal is adopted by your Council, we would be grateful if you could send the relevant map Shapefile to my colleague [REDACTED]@org.uk.</p> <p>It must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently relate to this or later versions of the Appraisals and Management Plans, and which may have adverse effects on the environment.</p>
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				Finally, these comments do not address unscheduled archaeology. Please seek comments on these matters from your Council's own Archaeology Officer.
67	Natural England			Thank you for your consultation request dated and received by Natural England on 18th October 2023. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in Local and Neighbourhood planning and must be consulted on draft development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this Conservation Area Character Statement. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk
68	Environment Agency		No Comment	
69	Cllr Tristram Burden		I'm voicing an objection to this character statement. Particularly the extension of the area into existing private housing and communities. Regardless of the historical value of these buildings, and their previous relation to the college, they should not be included in this character statement or regarded as part of the conservation area. It should not extend further than taking the existing purple line and extending it down Walpole Rd. The houses are privately owned and the college should not have undue influence over how residents and homeowners live or decide to develop their homes in the future. The college is a valuable stakeholder for the city, but the current draft weights too heavily in their favour to have unequivocal influence over the future of the area.	
70	Cllr Chandni Mistry		Re the College Conservation Consultation Document. It describes the character of the area as 'not predominantly residential'. This is not true and seems to be giving the college future permission to disregard the residents even more than it does at present. It used to be the local private school. For a small fee locals had some access to the sports facilities. (My state educated children learnt to swim there). The neighbours were invited to Christmas midnight mass in the chapel and we all enjoyed their Nov 5th firework display. But in the last decade this has changed. We have put up with all the building work including huge lorries blocking our roads while delivering massive building supplies. It is buying up property and so changing the area for the worse. Three family houses and a house for seven bedsits has been bought in Walpole Road in the last 2 years and are now becoming dormitories (therefore empty for much of the time and not part of the community). The happy friendly neighbourhood is being devoured by Brighton College. Please do what you can to make sure balance between the neighbourhood and the college is equal and fair.	
71	Cllr Liz Loughran		<ul style="list-style-type: none"> • More photos needed to illustrate the detail generally and particularly for the relationship of College to adjacent streets • Edits to Page 5 (spelling) 	

		<p>Since the 1960's period the school has developed rapidly, first with functional buildings of limited architectural ambition then at the end of the century when the college's building budget increased dramatically some more positive contemporary buildings have added to the architectural interest and variety of the conservation area. Over the last 20 years all of its biggest and most ambitious construction projects have been completed by some prominent architects including KFM, Hopkins Architects, Allies and Morrison and Richard Griffiths</p> <ul style="list-style-type: none"> • Can you illustrate any of the new buildings as above and is there potential for these to be listed in the future as 21stC buildings or are they examples of good practice developments? If they are exceptional include any necessary advice on setting/views/ suitable scale and height. It would be good to include buildings that show a contemporary contrast with the old. • Pages 10/11 – maps needed to illustrate locations • Page 11: in Canning Street and should not be approved in future. In order to limit development that has a harmful impact on the character of the conservation area an Article directive should be considered for the conservation area – you mean Article 4 Direction. • College Conservation Area map – a bit basic – any chance you can get a higher quality map (you could keep this one and add a couple more e.g.) – residents will need something very clear to understand • Add any key views/vistas and landmarks (not clear they have been included) with photos. Say what is important in terms of retaining historic interest and also if you can predict where developers might have a go in the area where those locations might be and then give them some focus to those areas. Also what might be important in terms of 'significance' to keep - so Cllrs don't have to work it out (we probably won't and planning officers may not know). • Identify the concern about risk of possible over development as you suggest - if it is a threat and the importance of the existing open space for the setting of those College buildings. You could also refer to the more recent additions (hinting that the scope for further development is very limited??) Should you be referring to HE's Listing of the College in the Appendix (and perhaps summarise its key features – always a help as a user). • Does Historic England now recommend more interventionist actions in CAAs? The national design guide is good for themes/ideas. • Have you checked the NPPG in case there is more info here? • Do you know what the local community values and is this reflected? 	
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