

Dan Wickham,  
St William Homes LLP,  
Berkeley House  
115b St George's Wharf, London SW8 2LE

13 July 2020

Dear Dan,

**Brighton Gasworks site.**

Thank you for the presentation you gave on this scheme on 2 July to me and my colleagues Roger Hinton and Alasdair Glass from the Regency Society. It is helpful to understand your thinking at this early stage. This letter contains the Regency Society's response to your initial consultation.

We have a number of thoughts in relation to your proposal.

**Vision: a gateway between the South Downs National Park and the Seafront**

We think the theme you are developing about the connection between the South Downs and the sea ('Connecting Land and Sea' and 'Desire Lines') may be problematic. The north east of the site does indeed connect with a narrow stretch of the South Downs National Park – for most locals it probably connects more meaningfully with East Brighton Park and the golf course. The south west corner does not in any meaningful sense connect with the seafront because there are two major roads in the way, one some distance below, and in any case the connection is not to the sea. The seafront itself is at the bottom of a 30m cliff. You explained that this was a concept intended primarily to describe the view for residents at the site – however views to the downs and a broad view of the sea will presumably only be available to residents living on the upper floors of some of the buildings. We think this concept is flawed for these reasons.

We believe there is an opportunity for a development on this site based on a different and more appealing concept to do with the immediate locality. East

Brighton in this location lacks social coherence as a result of piecemeal development of separate communities, largely in the 20<sup>th</sup> century, and the fact that this site is placed awkwardly immediately adjacent to the steeply sloping access road to the Marina. I mentioned Whitehawk, directly to the North, a large area of deprivation with few amenities. The area to the west is interesting but perhaps difficult to understand unless you know the area: the mews and courtyards created as part of the original Kemp Town estate are now home to a myriad of small businesses, many of them creative in different ways. Studios, workshops and other small enterprises abound. To the East, as you know, is Marine Gate, which once offered a complete hermetic community environment to its residents with shops, a restaurant, a bank and bar, but now struggles with any focus of social cohesion as almost all available internal space is now flats. The Marina has been developed as a relatively self-contained and separate area with its own identity as a visitor destination and the new proposal for the outer harbour will do little to connect it with its surrounding area if it goes through.

It was not always like this. During the period when the gas works was active (between the 1820s and 1885 when production moved to Portslade, leaving this site only for storage) the site was an employment hub for the area. Before the 1930s there was a coherent community based in the destroyed streets of which Boundary Road, Arundel Road and Arundel Street are a residue. The site of Marina Way was once Rifle Butt Road (you have an image of it in your publicity material) – named after local efforts to prepare for a feared Napoleonic invasion. It contained several shops and businesses, as well as a chapel and graveyard. Black Rock Cottages was at the southern end of the proposed development site. This site has been central to the area for two centuries, albeit as a blighted, dead area effectively since it was bombed in 1943.

We think there is an opportunity to use this site to bring coherence back. We very much like your idea of reflecting the industrial past in your design. If there were a way of incorporating something to do with the creative community (workshop spaces, maybe even a community space which could be a venue for sales and exhibitions) and even a local market space to add to the offerings of Lidl and the Co-op and pull people into the site as somewhere to go, residents of the area as a whole might see it as a hub and connecting space. A nursery or school and/or medical hub would also add to this effect. To develop detail around such a concept would involve a lot of community consultation in the design but it might transform this rather desolate and meaningless area.

In our view this would add greatly to the appeal of the scheme.

Regency Society member and architect Stephen Adutt has been working on the North Street Quarter scheme in Lewes which shares some characteristics of this site. It is on the site of former industrial land (including a Victorian

ironworks) which has presented a number of difficulties. A long and careful process of local consultation has produced a scheme which integrates this site with the wider town and reflects the sometimes conflicting aspirations of the various surrounding communities. I commend it to your attention – see <https://northstreetqtr.co.uk/> - the video on the home page gives a good overall impression.

You told us that you need greater housing density on the gasworks site than is required for the Lewes project. Nonetheless, the conceptual work in Lewes has been carefully executed to great effect in our view and might offer some stimulus to further thought about the right approach for the gasworks site.

### **Overdevelopment**

We have considerable concern about the scale of proposed development on this site, which will be out of scale with the immediate surrounding area. The lack of local amenity exacerbates the effect this issue will have on the local area. This is a major issue for us.

### **Affordability for local people**

In line with our general comments about the site concept and the urgent need for housing in Brighton and Hove we would like to see housing properties on this site fully occupied for much of the year. This would be necessary in any case to generate the case for the improved social amenity we are advocating. It is important therefore that housing on the site should be affordable to local people.

### **Acquisition of adjoining land**

You mentioned the possibility of acquiring parcels of land currently owned by Brighton and Hove City Council to the north and south of the site. We strongly support this acquisition as the site to the North in particular will effectively become blighted otherwise.

### **Connections for pedestrians**

We would like to see improved pedestrian connections to the site from all directions. This is particularly important in relation to the surrounding roads and the currently closed footbridge over Marina Way.

### **Wind corridors**

We are concerned that the current plan will create wind corridors between the blocks. This area is particularly exposed and subject to strong winds. There

are precedents for squares and crescents in the vicinity and we strongly suggest that these forms are considered.

### **Costs of development**

You explained that the density of this development, which is considerably more than in the City Plan for this site, is necessary for commercial reasons because this is a difficult site to develop due to its previous use as a gasworks and storage facility. Whilst we are sympathetic to this point generally, this argument is currently opaque and the case would be strengthened if more detail were be shared about costing assumptions which are being used to justify the proposed scale, and reasons given for the impracticability of researching the site to establish the extent of the difficulty before a planning application is made.

I hope these comments are helpful. Please feel free to contact me if you would like further details.

Yours sincerely

A handwritten signature in black ink that reads "Mary McKean". The signature is written in a cursive style with a period at the end.

Mary McKean  
Chair