

Planning and listed building consent applications BH2022/02443 and BH2022/0224

Brighton Hippodrome CIC (community interest company) formally objects to these applications for the following reasons.

Summary of major issues

- The plans contain insufficient detail and evidence of an overall strategy and business plan.
- Liquor licensing in the cumulative impact zone (CIZ) may limit the potential of the scheme.
- Issues of noise transfer and neighbourhood disturbance are not addressed.
- The impacts of regular 1,800-person concerts are not discussed.
- This proposal is similar to one that failed for a major music operator 10 years ago.
- The scheme is not reversible for future theatre use, as required of previous schemes.

The Hippodrome is listed Grade II*—a *'particularly important buildings of more than special interest'*.

The proposals in the application have not been fully developed. The seven-storey aparthotel is too high. The proposals for the auditorium and stagehouse are too vague and do not reflect the Grade II* status of the Hippodrome. It is not possible to judge whether the proposals will result in long-term sustainability.

There is no actual or underlying business plan, or even reference to one. Does one exist? **Where is the evidence of a viable financial operational plan** or cashflow projection? Even Matsim's own consultants (Colliers) had *'not attempted to construct a financial model specifically for either the auditorium or the development in its entirety.'* Colliers states: *'This is because **the scheme is not yet specified in sufficient detail** to enable it and the plan would, as a result, have to be speculative.'*

It is proposed that the Hippodrome will be used all day and all year round, uses varying from a café to a venue for major bands. **Live music will be the core use.** Other proposed uses are 'cabaret and event cinema, theatre (on stage and in the round), banquets, corporate events, specialist markets and weddings', also 'conferences and other events such as lectures and presentations, press events, product launches, exhibitions, etc'.

The application includes no detail of the requirements for such a wide range of uses. There is no outline event programme.

Has the proposal been reviewed by specialist venue consultants? (Apparently not.)

- Disabled access is inadequate, eg, there is no lift access to circle level.
- Backstage facilities do not conform to current standards, including for disabled performers.
- The access route to the stage from the yard on the north side of Hippodrome House requires negotiation past cycle racks, tables and seating, and through five standard doorways. It is also unacceptably shared with access to the serviced offices and members' club.
- The very small lobbies at stage left and stage right compromise stage access, delivery and removal of sets and stage equipment. There is no access to the stage for large performance equipment.

Up to 18 late-night events are planned with egress via Ship Street. How can up to 1,800 people exit via a circuitous route through the back-stage area and into a narrow passageway alongside the aparthotel? **Of concern is that there is no mention of this in the fire and safety assessments.**

There is no evidence of consultations, still less agreements, with potential partners or operators—hotel and office management companies or caterers.

Would any venue operator or promoter, especially of the 'major bands' proposed, accept the proposed layout and facilities?

The proposal is essentially similar to that developed in 2007-2012 by the huge Academy Music Group/LiveNation to create a live music venue with a late-night club. AMG withdrew from making a

planning application because of insuperable problems with noise issues and limitations on liquor licensing in the CIZ. **If the world's largest music promoter couldn't make it work, how can Matsim?**

The report by Acoustic Associates Sussex states: 'significant mitigation measures to the current state of the building [and] **substantial upgrades to the building envelope' will be necessary.** Noise breakthrough to the aparthotel and office development has neither been measured nor reported. There is no proposal for adequate acoustic separation between the auditorium and the adjoining dwellings in Ship Street Gardens. Acoustic measurements were only made externally and not internally of breakthrough in party walls in the properties themselves.

The current applications propose irreversible alterations to the site (building on the access yard, loss of fly-tower and stage-house, etc). BHCC and other statutory consultees have previously required the **reversibility** to be incorporated into plans for the Hippodrome. This proposal means that large-scale theatre will be forever lost to the city.

The potential for failure of this project is therefore significant. If it cannot be reversed and it fails, the city will be left with .

Recommendations

- The Planning Committee should **reject these applications** until concerns over business viability, liquor licensing, noise, reversibility and appropriate consultations have been resolved.
- These applications should be considered in the context of the recommendations about this site stated in the Local Plan Part One and Old Town Conservation Area management plan.
- As a **major project** concerning one of the city's most important listed buildings, the planning decision should be **referred to full council** for final approval.
- **To protect the future of this heritage asset**, the aparthotel, offices and members' club should not be implemented until **restoration of the auditorium is completed and a secure operational plan is in place.**

Errors

The Design & Access (D&A) incorrectly refers to the Hippodrome as only Grade II. It is Grade II*. The Heritage Statement is under-researched and inaccurately repeats errors from the Historic England listing (paras 2.12 and 2.22).