

**PLANS LIST  
ITEM A**

**Richmond House, Richmond Road, Brighton**

**BH2013/00197  
Full planning consent**

**15 MAY 2013**



<b><u>No:</u></b>	<b>BH2013/00197</b>	<b><u>Ward:</u></b>	<b>ST. PETER'S &amp; NORTH LAINE</b>
<b><u>App Type:</u></b>	<b>Full Planning</b>		
<b><u>Address:</u></b>	<b>Richmond House, Richmond Road, Brighton</b>		
<b><u>Proposal:</u></b>	<b>Demolition of existing 2no storey building and construction of 1no three storey building and 1no five storey building providing 144 rooms of student accommodation, with associated ancillary space, 186 cycle spaces, removal of existing trees, landscaping and other associated works.</b>		
<b><u>Officer:</u></b>	Liz Arnold Tel 291709	<b><u>Valid Date:</u></b>	15/02/2013
<b><u>Con Area:</u></b>	Adjacent to Round Hill	<b><u>Expiry Date:</u></b>	17/05/2013
<b><u>Listed Building Grade:</u></b>	N/A		
<b><u>Agent:</u></b>	Lewis & Co Planning, Paxton Business Centre, Portland Road, Hove		
<b><u>Applicant:</u></b>	Mr Andrew Lambor, The Agora, Ellen Street, Hove		

## 1 RECOMMENDATION

- 1.1 That the Committee has taken into consideration and agrees with the reasons for the recommendation set out in section 11 and the policies and guidance in section 7 and resolves to **REFUSE** planning permission for the reasons set out in section 11.

## 2 SITE LOCATION & DESCRIPTION

- 2.1 The application site (approximately 0.16 hectares) is located on the eastern side of D'Aubigny Road, at the eastern end of Richmond Road and on the southern side of the existing Service Road, accessed via Hughes Road, which provides private access to the rear of the Lewes Road Sainsbury's. The Service Road and the eastern end of Hughes Road is set at a much lower level than Richmond Road/D'Aubigny Road as a result of the topography within the area. A steep embankment is located in the northern section of the site, between the existing office building and the service road/Hughes Road. The service road is located on a west to east gradient whilst Hughes Road has an east to west gradient as it progresses into the adjacent Industrial estate.
- 2.2 The site is currently occupied by a 2 storey, white rendered, office block of a 1920s/1930s style with associated car parking area, set within a triangular plot, with the steep embankment to the north. The main frontage of the existing building fronts onto Richmond Road and D'Aubigny Road whilst the rear elevation fronts onto the adjacent service road, albeit at a raised level.
- 2.3 Richmond House lies immediately adjacent to the Round Hill Conservation Area. Within the Conservation Area and immediately in the vicinity of the site are some 2 storey rendered terraced houses with pitched roofs, set behind small forecourted gardens with rendered boundary walls.
- 2.4 The area to the north of the site, which is set at a much lower level, comprises a new part 2, 3, 4 and 5 storey flat development and historic two storey terraced

houses, which front onto Hollingdean Road. Centenary Industrial Estate is located to the north-west of the site and contains modern warehouse style buildings.

### **3 RELEVANT HISTORY**

**BH2002/00897/FP:** Alterations to window arrangement to north elevation. Approved 28/05/2002.

**BH1997/01565/FP:** Alterations and extensions to premises comprising rendering over brickwork first floor infill extension to provide ladies WC. Two storey extension to front to form new stairwell, entrance and ramp, and creation of new parking facilities. Approved 06/01/1998.

**95/1307/FP:** Change of use of first floor from storage and premises to health club and gymnasium. Refused 09/01/1996.

### **4 THE APPLICATION**

- 4.1 Planning permission is sought for the demolition of the existing office building (use class B1), the excavation of part of the existing embankment and the erection of two new buildings to provide 144 rooms for student accommodation (use class Sui Generis) with associated ancillary space, cycle storage, removal of existing trees, landscaping and other associated works.
- 4.2 Building 1 would be excavated into the existing embankment and would front onto Hughes Road/Sainsbury's Service Road. This 5 storey building would comprise 129 studio/self-contained units, including 5 accessible units (all with their own en-suite, dining and kitchenette areas). A lift would be provided to each floor level. A reception area, office/security room, laundry room, plant room, guest WC, common room and area for the storage of 186 cycles would be provided at ground floor level. A refuse store, accessed externally, would be provide at 2<sup>nd</sup> floor, which would be level with Richmond Road/D'Aubigny Road. The main entrance to this building would be from the corner of Hughes Road, with secondary entrances on the service road frontage at ground floor level and the Richmond Road/D'Aubigny Road frontage at second floor level.
- 4.3 Building 2 would front onto D'Aubigny Road and would be 3 storeys in height. This building would contain 3 cluster flats, each containing 5 en-suite bedrooms with shared kitchen/dining/siting room facilities. The only entrance to this building would front onto D'Aubigny Road.
- 4.4 3 car parking spaces are proposed between the buildings at the Richmond Road/D'Aubigny Road level.

### **5 PUBLICITY & CONSULTATIONS**

#### **External**

- 5.1 **Neighbours: 141 (One Hundred and Forty One)** letters of representation objecting to the proposal have been received. The address details are annexed to this report (Appendix 1). The objections are for the following reasons:-  
Design/Visual Amenities

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- The proposed building is poorly sited and is not in keeping with the residential buildings due to both its excessive height and materials of construction, which are completely out of character and will be very jarring to the eye,
- The development is in the middle of a Conservation Area. The Council upholds this at present with rigour to the extent that doors and windows can only be replaced following strict rules. Residents uphold and support these rules as supportive of the special and historic character of the area. The approval of a massive modern accommodation block, three times the size of the current building, would totally dominate the area while being completely out of keeping with it and would render the Conservation Area rules farcical. Any residential property with direct frontage onto these roads (Richmond Road and D'Aubigny Road) should be subject and included within this parameters to maintain the integrity of the Conservation Area,
- Adds nothing positive to the Round Hill Conservation Area,
- Understand the development itself is not in the Conservation Area but since it will have such a large impact on the surrounding streets it should complement the existing buildings. Overall mass of the proposed design is far too big in scale and height to front onto the Conservation Area. The design does not “demonstrate a positive contribution to the local characteristics” (policy QD1) of Round Hill. It is three storeys high (higher than the street elevations around it) and will be constructed in blue/grey brick with aluminium windows when the vast majority of houses are finished in render with sash style windows. Round Hill is a Conservation Area and has “street elevations (which) are remarkably intact and devoid of 20th Century re-development” and is a “visually cohesive neighbourhood (which) retains uniform heights of 19th Century terraces and villas” (BHCC Round hill Conservation Area Character Statement),
- The proposal will result in the loss of significant local vistas from within Roundhill towards the South Downs National Park, which is recorded in ‘Document 21 Roundhill Neighbourhood Study’ prepared by Brighton & Hove City Council. Views to the South Downs are an important part of the area, the elevated building will destroy and obliterate these current views and irreparably damage the feel of the Conservation Area,
- The scale of the proposed development is completely out of proportion with the mixed residential character of the neighbourhood of today. Despite the larger of the two buildings being just outside the Conservation Area, the sheer size, height bulk and mass of the building would clearly be harmful to the existing and adjoining houses within the Round Hill Conservation Area. The three storey building would be wholly within the Conservation Area. The surrounding and adjacent buildings are all two storey and of a domestic scale and proportion unlike the proposal which is more akin to a commercial office building,
- There is a cohesive street elevation throughout Round Hill which retain the 19th Century character of the street and this will be compromised by the new development in terms of both scale and appearance,
- The proposal does not demonstrate a positive contribution to the local characteristics of Round Hill either in appearance, use or size. The proposed design shows no sensitivity to the special characteristics of the Conservation Area which it adjoin or for the impact it will have on it,



- The impact on the streetscene for local houses will be enormous, looks like a massive building even if some of the storeys are sunk into the hillside,
- The design is clearly aimed at maximising the number of students per square metre to a level that is way beyond the current neighbourhood's residential housing population density, which is already high,
- The appearance and size of the buildings is so dominant, dwarfing the houses in D'Aubigny Road,
- Will remove views into and out of the area,
- The Round Hill Conservation Area both provides and derives from the gaps between the terraces. The long public views into the Conservation Area are special in relation to the City's heritage, since Round Hill's period architecture remains remarkably uninterrupted and intact. The views out of the Conservation Area between Richmond Road and D'Aubigny Road extend to Wild Park, Coldean Woods, Bear Road, Woodvale, Tenantry Down and beyond. However, these long views are also available to streets to the west (e.g. higher up Richmond Road) and dwellings to the south-west (e.g. Ashdown Road) of the site. Users of Richmond Road and D'Aubigny Road will find that valued long views are interrupted by the large increase in bland facades,
- Within the consultation documents for the City Plan the Council states that its preferred options for 'All housing, but particularly high density tall buildings, should be in regard to the local characteristics of the surrounding neighbourhood and should consider the setting of the historic, built and natural environment'. The current proposal will not meet this preferred option,
- The elevations are extremely bland, featureless and repetitive and no effort whatsoever has gone into producing an interesting or innovative design picking up any of the character of its surroundings. This is shown clearly in the image looking down Richmond Road where the front elevation is very large, expansive and has no detailing to break it up in complete contrast with the Victorian houses on the right hand side, and
- The character statement for Round Hill Conservation Area highlights how it is "notable for its hilly siting with long terraces of houses framing distant views of the sea to the south and of the downs to the east". There are a number of locations on its streets where such viewpoints can be gained and one of these is along Richmond Road. The development will be seen in full context of one of the outstanding views from the Conservation Area and will have a harmful effect on views within it.

## 5.2 Amenity

- Increased noise and pollution from vehicles coming and going. Will add to the severe air pollution problem in the area,
- The taller building would be sited on the edge of an industrial estate, do not feel is acceptable or makes for a pleasant place to live,
- Noise and disturbance. The quiet streets will no longer be so if 144 students are coming and going at all hours, including late night drinkers. The Roundhill area already has a number of students living in it and they are extremely noisy. There are lots of young families that live in the area; the students that live here now are having a direct impact on them. If a large

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block of student accommodation is built in the area this will undoubtedly lead to more families leaving and the area will become completely dominated by students,

- Communal areas fronting onto Richmond Road/D'Aubigny Road will increase noise disturbance as students are likely to gather outside to smoke and socialise. This will be particularly highlighted in the spring and summer months when longer days and better weather will allow for outdoor use longer into the evenings and at night.
- Impact on neighbours is a situation that has clear and well documented precedent in the form of the 'Brewery Halls' off Southover Street which has changed the dynamic of the area and blighted the lives of residents for a considerable period of time
- Residents and visitors will only have a small outdoor space at the top of D'Aubigny Road and over 60 windows look out onto Richmond and D'Aubigny Roads. Both these elements will add to noise and disturbance in what is currently a quiet residential area,
- The planned collection of refuse from all 144 students on D'Aubigny Road (a relatively small road which already gets overly congested) will add to disruption and nuisance,
- Extra intrusion, loss of privacy and overlooking to homes on east side of D'Aubigny Road from windows at the southern end of the main building,
- The un-necessary secondary entrance for Building 1 onto Richmond Road and D'Aubigny Road, giving 100+ students access into a quiet residential community for no obvious reason. Whilst the developers claim that the 129 rooms on Hughes Road will be accessed by an entrance there, it seems likely that many will prefer to use the alternative entrance onto D'Aubigny Road to get into town, go shopping and return from town late at night as this entrance would be more convenient. This will lead to considerable noise and disturbance. The present population of D'Aubigny Road is about 50 people, this proposal seeks to increase it to nearly 200, a massive and inappropriate change,
- Light pollution,
- There are lots of families living in the area due to being in close proximity of good schools and great outdoor space, children will be able to witness students smoking and most probably drinking on the proposed outdoor pavement area, which is an incredibly bad influence if not quite disturbing for them,
- Noise break out from open windows in 74 student rooms facing Richmond Road and D'Aubigny Road,
- The Council's Environmental Department has on record the results of previous Acoustic Surveys carried out in the area. The results clearly show how low the ambient sound levels are, particularly at night, in the area around the upper access level of the proposed complex. The sources of noise from the development would be unmanageable and residents would be deprived of the conditions required for reasonable resting and sleeping as stated in British Standard BS8233 and recommended by the World Health Organisation Guidelines for Community Noise,
- Fail to see how clauses 2.52, 2.54 and 2.58 of policy SU10 can be met by this potentially noisy development,

- Anti-social behaviour of students,
- Presumably the rooms would be let for other use during the summer vacation, again creating noise and constant flow of people,
- Round Hill has narrow streets and houses closely built, many having virtually no front patios. The proximity to the street means disturbances late at night make a huge impact in those sleeping in front bedrooms,
- The developer does not appear to be too concerned about the welfare of the students as some of the rooms will have next to no natural light. The outlook for residents accommodated within its two lower floors would be very bleak. To the south-east 79 of the buildings windows would look onto the truck and van service toad leading to and from Lewes Road Sainsbury's. To the south-west the first two floors will be below ground level so the windows offered for the student rooms at level 1 would be in light wells,
- This is a quiet residential area and the scale of the business previously run from Richmond House has not affected that however the scale of what is proposed can only have a severe negative effect on the nature of the area,
- There can be no useable amenity space on level 0 since the 5 storey building will rise up from an industrial estate,
- Will tower above new flats currently nearing completion to the north of Hollingbury Road causing significant overshadowing and loss of privacy to and overlooking of these new flats,
- Noisy foot traffic along D'Aubigny Road, and
- Over-shadowing of adjoining residents.

### 5.3 Transport

- The transport infrastructure of Round Hill just could not handle all the services and visitors which a development of this size would draw,
- Makes no sense to pretend that the provision of 186 cycle spaces on the ground floor of the 5 storey building will provide the perfect 'car-free development' which would reduce the impact on Round Hill. There is likely to be considerable 'comings and goings' at times when nobody would want to be out walking or cycling and when public transport options would be considerably reduced. Provision for cycle spaces is fine, but the assumption that all residents could or would want to ride a bicycle is flawed.
- The mouth of the Centenary Industrial Estate and the truck/van service road off it serving deliveries to and from Lewes Road Sainsbury's provides unacceptable access onto pedestrian and cycle routes and networks,
- Provision for all other types of transport infrastructure would depend on Round Hill, the Richmond Road entrance at level 3, which the developer describes as "a secondary entrance, primarily for staff use",
- A true car-free development would be able to describe a safe and pleasant access for pedestrians and bicycles.
- The proposed cycle parking provision is not large enough, which would result in many cycle being chained to various railings, fences and lampposts, causing yet another obstacle for pedestrians, particularly wheelchair users, people with disabilities and parent/carers with buggies/prams,



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- Increased traffic of resident and services will put excessive strain on the narrow access roads,
- Will add to the existing parking problems in the area, especially at night. The new parking regulations for the area will already reduce the number of spaces currently available to residents in an already congested area. The little local streets will simply not be able to cope with the kind of access requirements that such a large development will inevitably incur, particularly as it will offer no parking solutions of its own whatsoever,
- There is no parking or waiting near the entrances in Hughes Road so all related traffic would attempt to use D'Aubigny Road. Cars trying to deliver/collect students simultaneously, such as at the beginning/end of term, in a road with no parking and no space to double park will cause congestion, pollution and disturbance,
- The plans do not address traffic flow and parking at the beginning and end of term the document in the application refers to students attending the university of Northumbria,
- Increased traffic would effect safety of children in area who regularly cross the road,
- Possible damage to parked cars from increased traffic movement in area,
- The main entrance from Hughes Road to the 5 storey building would not be suitable for people or bicycles as it is too steep. There is no waiting or parking facility near it and it is immediately adjacent to Sainsbury's lorry entrance and the entrance to the Industrial Estate,
- Neither of the building entrances provide vehicle waiting areas for taxis or parking facilities for visitors and it is unrealistic to assume that public transport will suffice,
- The autumn arrivals at other hall of residents with much better access roads often have to be staggered and even then the roads are grid-locked for hours,
- Although labelled a 'car-free' development many students would bring cars. Cannot see how something in a tenancy contract to prevent students bring a car will be policed. The area is already likely to be subject to a CPZ. Whilst the parking restrictions would be from 9am to 8pm the parking problem occurs when returning home after 8pm, this problem is likely to be exacerbated with more cars being parked after 8pm,
- D'Aubigny Road and Richmond Road effectively form a cul-de-sac, with all the existing parked cars the road space is quite narrow. Hollingdean Road is a horrible narrow hill filled with lorries and dustcarts. It is not safe cycling territory now, let alone when an extra 150 bikes have to use it,
- This is a quiet mainly residential area, especially since the vehicle 'rat run' from Ditchling Road via Richmond Road was ended by stopping access down Richmond Road. This has reduced traffic through Richmond Road, D'Aubigny Road and Roundhill Crescent. The proposal would increase traffic cut-through,
- The lower entrance on Hughes Road/Sainsbury's delivery road clearly could not be used in any way for parking or waiting as parking on this category of industrial land is limited to operational use only,
- Additional pressure on the bus service in the area which is already at saturation point due to the numbers of students in the area using the bus

service to travel to the Universities. Students will continue to use the no. 28 and 29 services which travels onwards out of the City. Presently those trying to travel on these routes are unable to guarantee arriving at their destinations on time as the buses are full, due to the sheer number of students. This will only get far worse if an additional 144 students are to be housed in the area,

- Cannot see need for something like 180 bicycle spaces for 142 [sic] students when the University of Brighton is only a few minutes walk away and there are good bus services to both Universities and into the City Centre,
- The development does not take into account the safety issues of students cycling to the area from Lewes Road and Upper Lewes Road, roads which are not very safe. Concerned that the applicant seeks to encourage all 144 students to use their cycles, they will most certainly hit the vogue gyratory which is a hotspot for cycle collisions,
- Previous businesses in Richmond House have had their own dedicated off-road parking spaces. The proposal replaces all that space with buildings whose occupants will produce a greater on-road parking demand,
- Parking standards SPGBH4, restricting motor vehicle use on the Centenary Industrial Estate to “operational”, make it an unsuitable site for any residential development,
- The trip generation quoted bares no relation to reality and the history of the site over the years. The car park was rarely full when the building was occupied so all the theoretical trips quoted never happened,
- The transport statement has taken no account of the fact that Roundhill residents were recently consulted on a residents parking scheme and have voted for it,
- There is no point monitoring the on-street parking after permission has been granted as suggested as it will be too late afterwards to put other measures into place, and
- The proposal does not offer sufficient space for disabled parking on the only level where this would be possible, i.e. within the Round Hill. Several bays could be needed for a development this size. Given that there will still be pressure on parking in Round Hill after the CPZ is implemented, it would be quite a challenge to prevent non-blue badge users from temporarily occupying disabled bays,

#### 5.4 Other

- Already a high number of students occupy properties in area. The quiet area has always had a nice mix of families, students, single professionals etc, the proposal would result in an imbalance/disproportion and would irrevocably and detrimentally alter the residential character of the quiet residential area. If allowed it could transform this area and make it an unwelcome environment to live in,
- 144 additional people to the area is more than enough, any more than 1 person per room will certainly be too many for the area,
- The current area is mixed residential with many families and some houses converted into HMOs occupied by students. The students living in a residential area learn how to get on with neighbours, modify their behaviour

and rub along accordingly. However introducing 144 new students to the area will radically change this balance and the expectations of peace and quiet at any time of day or night. With the influx of 144 students the personal contact currently achieved with students in the area, which has resolved disputes in the past, would not be possible,

- The proposal has 5 times the floor area of the existing building, leading to a loss of open green space, The buildings are on a massive scale, nearly doubling the footprint and trebling the built volume of the existing offices,
- If a residential development is proposed for the Conservation Area then it should be in keeping with the style and finish of the existing residential buildings, but if it is argued that the larger part of the development is on Hughes Road, then it is in the wrong place as an industrial estate is no place for 129 students, especially beside the access road to a supermarket loading bay, with no possibility for parents to deliver their offspring or collect them at term's end,
- It is far too big a complex to even consider for this site, there are many empty large buildings scattered across Brighton, why not renovate an existing site?,
- Crime. Having this many students living here will attract chancres who deal with petty crime,
- The refuse and recycling provisions are inadequate for a development of this size and the smaller block has no provision at all. Know how much rubbish and recycling students create. Enough time is spent cleaning up the Roundhill area by the community clean up. Black bags are left to be ripped open by gulls or foxes and recycling not being sorted properly leave streets dirty and pavements unclear, an extra 144 people will only make this problem a lot worse. Students leave rubbish out on the street at all times, not just collection days,
- Safety and well being. Having 144 students living at the bottom of the road is a daunting prospect,
- Lack of outdoor space for the students. As Hughes Road is so unpleasant expect all 144 students to use the strip of grass on D'Aubigny Road,
- The theory that purpose built student accommodation will release houses for families to rent is unlikely to work out in practice, since such renting does not offer the financial incentive to landlords that the student market does, with minimum being spent on maintenance and council tax exemption. Sceptical about claims that proposal will help move students out of family properties and ultimately help the City's housing shortage as both Universities want to increase student numbers,
- Too much emphasis is being given to the needs of students. The town is almost becoming a student accommodation campus, having noticed tow former public houses, The Northern in Ditchling Road and the Race Horse Inn in Elm Grove under construction to student bedsits and of course the immense development for students in the ex Co-op building in London Road. Bevendean, Hanover and other areas off Lewes Road generally are all suffering from the HMO effects caused by student demand,
- There will be no consideration for local residents given that students are only there for a short period of time and no addition to the community or any involvement,

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- One of the defining things about living in Brighton is sharing the City with students. They bring vibrancy and creativity to the area which would not want to discourage. However with plans already agreed for 351 rooms in the old Co-op building and another 750 proposed and currently under consideration at the Old Preston Barracks, cannot help feeling that the needs of the students are already being catered for within this locality and that the request for a further 144 homes in an area primarily housing families and older people just isn't appropriate or necessary. Indeed, with the downturn in the economy and the ever-increasing cost of gaining a university education currently resulting in falling student numbers, who can say whether these extra student properties would end up ultimately being an enormous waste of money,
- Don't think anyone would argue that the uninspiring office building currently on the proposed site is of any great architectural merit so replacing it with a few terrace homes to fit in with the existing street-scape or even a low-rise apartment block similar to that on Mayo Road would seem a suitable sympathetic development for this site whilst meeting a real housing need,
- Richmond House has been a white elephant ever since it was built and doubt anyone will mourn its demolition. However, to replace it with an even bigger monstrosity, which will completely overwhelm everything in sight, is surely a mistake,
- The Universities of Brighton & Hove have more than sufficient land, on campus, to build further Halls of Residents, where they can be suitably monitored. Building off campus is neither necessary nor appropriate. Know that there is need for student accommodation in the Brighton area. Surely there is vacant land to the north of the City that could accommodate a student housing development, rather than increasing pressure on the limited space within the City and Roundhill Conservation Area,
- Roundhill is not well suited to the installation of new public litter bins given the narrow footpaths so rubbish is likely to be strewn on the streets,
- The Design and Access Statement is littered with inaccuracies and misleading illustrations such as traffic free streets, flat roofs are indicated to all the surrounding buildings diluting the language of the neighbourhood and the proposed massing blocks are shown lower than the elevations and sections indicate. Also reference to local facilities such as Sky Gym which has not existed for a number of years is incorrect. Collectively these errors indicate a lack of local knowledge and research when developing the proposals,
- Thought the Council were attempting to limit the impact of students in the area with the new planning around certain areas that are suffering from studentification,
- Pressure on wi-fi/broadband, which is already unable to cope with the current numbers of residents,
- What is being proposed is, in effect, a large hall of residents, presumably unsupervised/unstaffed by professional residential wardens, i.e. persons with authority and status, employed by the Universities,
- Roundhill is struggling to foster community spirit and responsible citizenship, where as many residents as possible pull together, in an area in which density of population is already an issue. There is currently a real sense of

optimism in Roundhill, a celebration of the unique identity within the City. If the proposal goes ahead the job in strengthening community ties and building cohesion will be much more difficult because of a grafted on monoculture of 144 people who will inevitably constitute a distinct group that will change in September every year,

- The developer wishes to get as good a return as possible for the financial outlay and is therefore likely to wish to cram as many people as possible on to the site, whereas residents wish to preserve the quality of their community and wish to have some breathing space rather than seeing every spare bit of space crammed with as many people as possible, particularly when the area, as in this case, is already very densely populated. Human habitats must be fit for purpose otherwise the consequences will be dire and costly in terms of social problems and mental health,
- The area is a Conservation Area which reflects a special character based upon quite dense housing accommodation. There continues to be considerable pressure to use every single spare space for infill housing development. While the development is on the edge of the zone it will degrade the area as the site is currently occupied by a building with quite a small footprint and impact on the local environment, the natural route to town will be through Roundhill Crescent, a quiet residential street, students do not have much sense of pride and ownership of the area in which they stay and there will be access pressure on Richmond Road and D'Aubigny Road,
- From an aesthetic and ecological point of view, don't believe that it is acceptable to remove the only trees in the immediate area. The destruction of the remaining mature trees around Richmond House car park would remove an important visual barrier currently screening the Conservation Area of D'Aubigny Road from the industrial estate off Hughes Road. The trees visually break up the density of the housing in addition to providing a visual, audio and pollution screen to the residents from the noise and traffic related to and coming from the industrial estate on Hughes Road, the Sainsbury's supermarket and the Hollingdean Road,
- Among the Wildlife that currently makes use of this vital natural resource are great-spotted woodpeckers, jays and sparrow hawks, all protected under the Wildlife and Countryside Act of 1981,
- Overcrowding,
- The proposal is against Council guidance,
- An inappropriately large development for a residential area whose infrastructure in the area (parking, doctors, school, shops etc) are already over-stretched,
- City Clean are currently unable to collect recycling due to parked cars and increased traffic on both sides leading up to the proposed development. Such a large development will undoubtedly cause greater levels of material waste and there is a lack of access and allocated space for recycling collection and waste storage,
- Industrial sites are needed for the purpose of which they are designed. The Leader of the Council is concerned business will be pushed out if new government planning rules are introduced allowing commercial space to be converted to residential use,



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- Students should be accommodated on the old barracks in Lewes Road, a site badly in need of development with more than adequate space for more than 144 students and which is adjacent to the University, its library and other facilities. This would also mean less travelling for the students and leave the residents of Roundhill in peace,
- Its use as mass accommodation for a transient population consisting exclusively of students is not suitable for a quiet residential area that owes its community feel to the fact it has a good mix of families, retired people, some flats and a sprinkling of individual shared student houses,
- Emergency services being able to respond to call-outs are likely to be hindered by excess parking in the narrow streets,
- The development would permanently deprive the City of another commercial premise of this difficult to find size and type, which is crucial for future employment opportunities in the area. The proposed student accommodation will not provide any meaningful long term wealth generating employment in the area,
- Will increase footfall to an area already under strain,
- Owner of Sainsbury's access road will not allow construction access to the proposed site from the access road either during the build or after completion. Pedestrian access to the building via Hughes Road/Service Road would not be allowed either. Cannot see how the proposal is viable with no access via the access road,
- The proposal would represent an overdevelopment of the site resulting in 'town cramming' and a density of development in excess of what might reasonably be expected to be achieved on the site and would consequently be out of character with the area,
- Level 0 of the 5 storey building has two additional accesses for use in emergencies. These would direct occupants of the building to the truck/van service road where it would be dangerous for pedestrians (perhaps in a panic) to stray. Streetscapes, which pedestrians cannot use because they have been built for lorries, neither offer safe nor pleasant active frontages. Even the 'primary entrance' to the 5 storey building at a junction of the lorry service road is very limited in space. It would hardly be a safe place for a single cyclist to mount or dismount, let alone a small group,
- The application says that building one has a secondary access into Richmond Road to be used primarily by staff, but then also says elsewhere that 'multiple entrances will improve connectivity of the building with its surrounding neighbourhood'. How would it be enforced that the entrance onto Richmond Road would 'primarily be used by staff?'; it would be impossible to enforce given the deficiencies of the primary access and the two accesses (for use in emergency) at level 0,
- The application states that the background noise levels are already quite high, but this is not true in Richmond Road and D'Aubigny Road or any of Roundhill, it is a quiet area at all times. Hughes Road may well be noisier,
- The applicant has failed to address local residents concerns and the applicant has failed to properly maintain the existing building and surrounding site leading to its current under occupancy,

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- The design orientation is not conducive to a strong environmental performance with an exposed north elevation full of window openings being the most prominent,
- Such a large development will put an enormous strain on services such as refuse disposal, street cleaning, postal and commercial deliveries,
- The proposal does not meet the criteria for student housing set out in the student housing options paper for the City Plan. The paper also identifies the Universities preferred sites for new student accommodation; Richmond House is not identified as one of them,
- In the Council's submitted documents for the City Plan, it notes that there are currently no policies for the management of student housing but recognises that this is a gap as there are obvious conflicts in studentified areas with the local residents,
- The applicant notes the small number of existing student beds in Brighton relative to student population and claims that this population is set to increase year on year however results of an analysis carried out by the Times Higher Education Supplement that figures for student acceptances of university places were down 17% on last year and is attributed to the rise in student fees. Also changes in immigration rulings at the beginning of this academic year have already had a very big effect in student applications from outside the EU,
- The applicant includes supporting correspondence which states the marketing of the existing commercial building had little success because of the difficulties of access in narrow streets comprised by on street parking, surely this situation remains unchanged and will cause problems of access for building plant and create congestions and problems of access to the Round Hill area,
- It will not contribute very much to the neighbourhood in terms of supporting its health, social and cultural well-being, on the contrary it will make many demands upon existing residents,
- The agents acknowledge that the economic circumstances mean that there is little interest which is a short sighted approach to take, when the economy picks up there will be firms needing premises and a shortage of floorspace,
- Marketing information does not indicate that a fair rent is being asked for which the owner/developer clearly hopes will mean that there is little interest in the property. From the particulars information submitted, it seems that the estate agents are asking the same rent as modern offices with parking in central Hove and on Preston Park where the biggest offices are. This is despite the agents saying in the same document that Richmond House suffers from being isolated and outside the City Centre. Clearly the asking rent should be lower to attract the many start up firms in Brighton looking for premises,
- Development would devalue properties in area. It will make the area run down and unsought after,
- Student campuses have supervision and rules and more importantly all the residents are students. Nowhere in the proposal is there any indication of how the student community will manage itself. Will it merely be a privately

owned student hostel or will it be an academic community with residential staff present?

- The development would mean the loss of a commercial premises which could house local businesses employing people local to Brighton,
- The Hughes Road access serves disabled people very badly,
- The Richmond Road access could involve complications. Service vehicles for refuse and recycling collections can block Round Hill streets, assembling long queues of cars behind them. Servicing a 144 room development from Richmond Road/D'Aubigny Road will put far too much pressure on those streets. These would certainly have safety implications, and
- The proposed design makes little attempt to reduce its environmental impact other than the addition of a sedum/grass roof and the design does not indicate how the proposed BREEAM 'very good' rating would be achieved and no design stage evidence has been submitted.

5.5 **Five (5)** letters of representation have been received from **41 Thompson Road, 24 Thornhill Avenue, 61 Coldean Lane, 4 Beaufort Terrace, and 164 Saunders Hill Road** supporting the application on the following reasons:

- It is a much better place for students than other areas`,
- It is better for students to be living in flats that are built for them with shared space,
- Fed up with students living in other streets taking up the parking spaces and changing the area and feel from a family estate,
- Better to provide the right housing for students in the right area,
- Brighton is a two University town with a great student culture,
- Hanover has student housing and all the advantages of a vibrant community, and
- Richmond House is in a fantastic location adjacent to the Lewes Road transport system (bus and rail) in close proximity to the Universities,
- There is a severe lack of designated student accommodation,
- The site has many benefits and suits this use, and
- It will assist the local area in taking students away from the much needed family housing.

5.6 **One (1)** letter of representation has been received from **12 Brangwyn Drive** commenting that the Coldean area is being over run with students. Residents in Coldean can never park and get late night disruption. Housing students in purpose built blocks is a better option to filling up family areas.

5.7 **Conservation Advisory Group (CAG):** Object The group recommend refusal of the application on the grounds that it would be detrimental to views of the Conservation Area and from the Conservation Area to other parts of the City. The design of the proposed building is unattractive and unsympathetic in its design and materials to the neighbouring buildings in the adjacent Conservation Area. It was felt the materials proposed would be unlikely to perform well in the local marine environment. The 3 storey building at Richmond Road level is excessive and would block gaps between the terraces. The group requested that the application be referred to the Planning Committee to determine if Officers are minded to approve.

- 5.8 **East Sussex Fire and Rescue Service:** Have no comments to make.
- 5.9 **Environment Agency:** Comment Having screen the planning application with regard to the low risk of the development type and location of the proposal, can confirm have no comments to make.
- 5.10 **Southern Water:** Comment Following initial investigations, there is currently inadequate capacity in the local network to provide foul sewage disposal to service the proposed development. The proposed development would increase flows to the public sewage system and existing properties and land may be subject to a greater risk of flooding as a result.
- 5.11 The public sewer is a combined system, receiving both foul and surface water flows and no flows greater than currently received can be accommodated in this system. However, it is possible that by removing some of the existing surface water entering the sewer, additional foul flows could be accommodated, i.e. no net increase in flows.
- 5.12 As an alternative, additional off-site sewers, or improvements to existing sewers can be provided to service the development.
- 5.13 Should the application receive planning approval, request that a condition is attached requiring details of the proposed means of foul and surface water sewerage disposal to be submitted to and approved in writing.
- 5.14 **Sussex Police:** Comment Disappointed to note that the Design and Access Statement submitted in support of the application fails to make a single reference to the crime prevention measures to be incorporated into the design and layout. The National Planning Policy Framework demonstrates the government's commitment to creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Design and access statements for outline and detailed applications should therefore demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places set out in Safer Places – The Planning System and Crime Prevention.
- 5.15 Control of entry to student halls is paramount and to that end an access control system must be incorporated. A number of security measures to the building are recommended including access control system to the communal entrance doors, flat entrances be devoid of letter apparatus and have door viewers, postal arrangements to be made that there is no need for postal workers to access any further than the lobby, any ground floor and easily accessible windows to have laminated glazing to a minimum thickness of 6.4mm and have limiters fitted to reduce opportunist theft, communal areas to have dusk till dawn switched lighting with remaining corridors being switched with PIR operation and consideration should be given to installing CCTV.

- 5.16 The cycle store entry doors should confirm to either PAS 024 or LPS 1175 SR2, have thumb turn locking system internally to reduce accidental locking in. Lighting within should be switched by PIR operation and recommends that the cycle store is sub divided to further protect cycles. The stands should be robust enough to support and be cable of securing the cycles with both wheels and the frame.
- 5.17 Due to the quantity of proposed rooms have concerns over the amenity of the residents in the adjacent streets in the form of noise, litter and incidents of anti-social behaviour.
- 5.18 **UK Power Network:** No objections.
- Internal:**
- 5.19 **Access Officer:** Does not currently comment on student housing.
- 5.20 **Arboriculturist:** No Objection. The proposal would result in the loss of trees covered by Tree Preservation Orders, however they are mostly all diseased or structurally defective and should be felled on the grounds of safety regardless of whether the development proceeds.
- 5.21 Overall no objection to the proposal subject to replacements being planted as part of a landscaping scheme.
- 5.22 **City Clean:** Comment.  
(Original comments 4/04/2013) The proposed bin store is not big enough for a development of this size. Have worked with Sussex University and calculated, using their data, that each student needs 0.17litres of a 1100 litre bin. This development would need 25 times 1100 litre, bins for a weekly collection. The Council cannot unfortunately offer a more frequent collection.
- 5.23 For 25 bins with a footprint of 1.28m<sup>2</sup> per bin, an initial floor space of 32m<sup>2</sup> would be needed (this would be gridlocked) however to allow for manoeuvrability this would need to be multiplied by a factor of 2.5 (as stated in PAN05). To meet requirements the bin store would need to be 80m<sup>2</sup> to allow for a weekly refuse and recycling collection for 144 students.
- 5.24 (Additional comments 5<sup>th</sup> April 2013) Have concerns over parking restrictions to allow for the reuse and recycling vehicles to pull in and not block the road for long periods of time. Would need to see how parking will be restricted along the kerbside near the bin store.
- 5.25 **Ecology:** Comment Some loss of habitat of very local important is proposed as part of the development. However this can be compensated for and the development more than meets the requirements of planning policy with regards to nature conservation enhancement.
- 5.26 **Economic Development:** Comment. Has no adverse economic development comments but requests a contribution through a S106 agreement for the payment of £7,840 towards the Local Employment Scheme in accordance with



the Develop Contributions Interim Guidance and the provision of an Employment and Training Strategy with the developer committing to using 20% local employment during the construction phase.

- 5.27 **Environmental Health: Comment.** (22<sup>nd</sup> March 2013) that a full contaminated land condition is recommended for the development.
- 5.28 (Additional comment 17/0/2013 following a query by the Case Officer) Regarding the plant room, would recommend that the development achieve airborne sound insulation greater than Approved Document E for shared floor/ceiling between the room and the bedroom above. Would also recommend that the developer place any plant on anti-vibration mounts. Could also ask for a scheme for sound proofing for the plant room to prevent noise and vibration affecting future occupiers.
- 5.29 **Heritage: Objects.** Richmond House lies immediately outside the Round Hill Conservation Area. It fronts on to Richmond Road (the remainder of which is within the Conservation Area) at its junction with D'Aubigny Road (also in the Conservation Area). The site is prominent in views down Richmond Road, where the topography is such that it is viewed against a backdrop of the houses and downland on the other side of the valley. It is also visible in views along D'Aubigny Road.
- 5.30 The current building consists of a 2 storey white office building, of a 1920's/1930's style. The building is not in keeping with the predominant character of the Conservation Area, which consists of rendered terraced houses with pitched roofs, set behind small forecourted gardens with rendered boundary walls. Although it is of a larger floorplate than the surrounding buildings, its height is in keeping with the surroundings.
- 5.31 A steep embankment is set to the rear of the site, and is part of a number of similar embankments. These (in the general area of the former railway line) create an important distinction between the Conservation Area and the more varied character of the area to the north. The area to the north is at a much lower level and includes large modern warehouse style buildings, a new block of flats and the service road to Sainsbury's, as well as more historic terrace buildings.
- 5.32 The Conservation Area character statement describes the surviving railway line as 'Round Hill's green corridor'. Indeed this line and ribbons of green formed by large back gardens to the dwellings are prominent in views, particularly from Bear Road and Race Hill Road. The character statement states that 'There are few visible trees, as most of the houses have no front gardens and the private gardens behind are largely screened from close public view. However there are some notable trees on land just outside the conservation area at the north-east end of Richmond Road' (i.e. the development site).
- 5.33 The overall massing and bulk of the building is much greater than the existing. Although designed such that the bulk is not visible from the Conservation Area,

it will nevertheless appear as a greater mass. The monolithic roofscape emphasis this, such that the overall massing appears excessive for the site.

- 5.34 The loss of the embankment will erode the distinction between the Conservation Area and surrounding less cohesive streetscene to the north and will also likely lead to a loss of green in both views from within the Conservation Area and longer views.
- 5.35 The trees on the site are identified as important within the character statement. Although it is proposed to retain one tree on the site and add further trees, the overall density and massing of the proposal means there is insufficient space for sufficient planting and landscaping to compensate for the loss of the bank.
- 5.36 The buildings are similar, although slightly taller, than the existing building and are thus intended to be in keeping with the scale of existing buildings in the Conservation Area. The overall bulk of the building is nevertheless much greater and the design should be amended to break the bulk of the building down further. Introduce further vertical emphasis and to reflect the architecture of the Conservation Area to a greater extent. The proposed material is bluish brick; however this is not a common material in the Conservation Area and it is considered that render would be more appropriate.
- 5.37 Building 2 is sited such that it relates to the streetscene along D'Aubigny Road. Building 1 however does not have a direct relationship with the road and in this respect is not in keeping with the Conservation Area. Building 1 is higher than building 2 and therefore does not appear to step down the hill when viewed from within the Conservation Area.
- 5.38 There are no conditions/mitigations that can overcome the objections. The proposal should be substantially reduced in scale and its design substantially amended to better reflect the character of the Conservation Area.
- 5.39 **Planning Policy: Objects.** (Original comments 21<sup>st</sup> March 2013 and amended comments 5/04/2013 regarding provision of recreation space) The proposal is contrary to policy EM3 in the Local Plan and CP3 in the submission City Plan Part 1 in that the applicant has failed to demonstrate that the site is both redundant and incapable of meeting the needs for modern employment uses. The proposal provides insufficient marketing evidence and fails to retain any employment floorspace as part of the redevelopment scheme. In terms of the proposal for purpose built student accommodation, this is contrary to policy CP21 in the submission City Plan as it is a site identified as having potential for housing and no evidence has been provided that it is supported by one of the City's educational institutions.
- 5.40 (Additional comments 16<sup>th</sup> April 2013 following receipt of a letter from the agent) Legal advice has been sought over the appropriate weight to be given to each policy in the emerging City Plan and are satisfied that it is appropriate to afford Policy CP21 significant weight as it is a new policy which covers an area not addressed by any policies in the existing Local Plan. CP21 is not considered to

have significant unresolved objections and is underpinned by background evidence.

- 5.41 Although the applicant is correct in stating that the strategy for the Lewes Road Development Area is to enhance the area's role as an academic corridor, part A3 of the policy indicates that one means of achieving this is to encourage the development of employment floorspace. Taking this together with Policy EM5 which states that if the offices are considered genuinely redundant, preference will be given to alternative employment generating uses on the site, it is considered appropriate for the applicant to demonstrate why alternative employment uses have not been pursued in preference to student housing development.
- 5.42 The applicant states that waste management issues are covered by separate legislation. However, the East Sussex, South Downs and Brighton & Hove Waste & Minerals Plan is an adopted DPD and therefore part of the development plan for the city. Compliance with its policies should be demonstrated. Policies WMP3d and WMP3e are considered to be relevant to this proposal. Provision of a Site Waste Management Plan is a means through which compliance with Policy WMP 3d could be demonstrated.
- 5.43 The plans for the proposed scheme appear to show that the majority of the units are self-contained studio type accommodation. This would be considered sub-standard accommodation if marketed as conventional studio flats on the open market, but is appropriate for students. Should you be minded to approve the application, a condition should be attached to ensure that these units cannot subsequently be offered on the open market.
- 5.44 **Public Art Officer:** Comment In order to make sure the requirements of policy QD6 are met at implementation stage, it is recommended that an 'artistic component' schedule be included in the section 106 agreement.
- 5.45 **Sustainability:** Comment As a major development over 1,000m<sup>2</sup>, this development will have to meet SPD08 policies for major developments.
- 5.46 **Sustainable Transport:** Comment. (Original comments 11<sup>th</sup> April 2013) There are substantial problems with the submission but these can be addressed by the substantial S106 and conditions requirements specified in respect of a S106 contribution of £51,345 for sustainable modes provision locally and conditions relating to a management plan to comprise of a standard travel plan, disabled parking provision, provision for deliveries and arrangements for the start and end of term, approval of lease for student residents to prevent them from bringing cars into Brighton and enforcement mechanism for this, cycle parking and revision to crossover plans.
- 5.47 (Additional comments 1<sup>st</sup> May 2013 following Transport Committee on the 30<sup>th</sup> April 2013) The extension to zone J of the City's CPZ was approved by Transport Committee and will be operational from the 1<sup>st</sup> Jul 2013. Therefore on that basis can confirm that the Highway Authority would still recommend that the development in question be made car free.

## **6 MATERIAL CONSIDERATIONS**

- 6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that “If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”
- 6.2 The development plan is:
- Brighton & Hove Local Plan 2005 (saved policies post 2007);
  - East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (Adopted February 2013);
  - East Sussex and Brighton & Hove Minerals Local Plan (November 1999); Saved policies 3,4,32 and 36 – all outside of Brighton & Hove;
  - East Sussex and Brighton & Hove Waste Local Plan (February 2006); Saved Policies WLP 7 and WLP8 only – site allocations at Sackville Coalyard and Hangleton Bottom and Hollingdean Depot.
- 6.3 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and is a material consideration which applies with immediate effect.
- 6.4 Due weight should be given to relevant policies in the development plan according to their degree of consistency with the NPPF.
- 6.5 The Brighton & Hove City Plan Part One (submission document) is an emerging development plan. The NPPF advises that weight may be given to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies to the policies in the NPPF.
- 6.6 All material considerations and any policy conflicts are identified in the “Considerations and Assessment” section of the report.

## **7 RELEVANT POLICIES & GUIDANCE**

### The National Planning Policy Framework (NPPF)

### East Sussex, South Downs and Brighton & Hove Waste & Minerals Plan

#### Brighton & Hove Local Plan:

TR1	Development and the demand for travel
TR2	Public transport accessibility and parking
TR4	Travel plans
TR7	Safe Development
TR8	Pedestrian routes
TR13	Pedestrian network
TR14	Cycle access and parking
TR18	Parking for people with mobility related disability
TR19	Parking standards

## PLANS LIST – 15 MAY 2013

SU2	Efficiency of development in the use of energy, water and materials
SU3	Water resources and their quality
SU4	Surface water run off and flood risk
SU5	Surface water and foul sewerage disposal infrastructure
SU9	Pollution and nuisance control
SU10	Noise nuisance
SU13	Minimisation and re-use of construction industry waste
SU14	Waste management
SU15	Infrastructure
SU16	Production of renewable energy
QD1	Design – quality of development and design statements
QD2	Design – key principles for neighbourhoods
QD3	Design – efficient and effective use of sites
QD4	Design – strategic impact
QD5	Design – street frontages
QD6	Public art
QD27	Protection of amenity
QD28	Planning obligations (likely contributions towards transport, education, open space, public art)
HO2	Affordable housing – ‘windfall’ sites’
HO3	Dwelling type and size
HO4	Dwelling densities
HO5	Provision of private amenity space in residential development
HO6	Provision of outdoor recreation space in housing schemes
HO7	Car free housing
HO13	Accessible housing and lifetime homes
HE6	Development within or affecting the setting of conservation areas
EM3	Retaining the best sites for industry
EM5	Release of redundant office floorspace and conversions to other uses

### Planning Advice Note

PAN05	Design Guidance for the Storage and Collection of Recyclable Materials and Waste
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### Supplementary Planning Guidance:

SPGBH4	Parking Standards
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### Supplementary Planning Documents:

SPD03	Construction & Demolition Waste
SPD06	Trees & Development Sites
SPD08	Sustainable Building Design
SPD11	Nature Conservation & Development

### Brighton & Hove City Plan Part One (submission document)

DA3	Lewes Road Area
CP1	Housing Delivery



CP3	Employment Land
CP16	Open Space
CP17	Sports Provision
CP21	Student Accommodation and Houses in Multiple Occupation

## **8 CONSIDERATIONS & ASSESSMENT**

- 8.1 Matters relating to the impacts of the proposal on the financial value of neighbouring properties is not material planning consideration in the determination of the application.
- 8.2 It is noted that a letter of representation has been received from the owner of the Sainsbury's Service Road stating that they would not allow pedestrian or vehicular access to the road during or after completion of the building, however this is not a material planning consideration, rather it is a civil matter and therefore does not prohibit the determination of the application.
- 8.3 The main considerations in the determination of this application relate to the principle of the loss of the existing office accommodation, the demolition of the existing building and the suitability of the site to accommodate the proposed 3 and 5 storey buildings, the impact of the proposed development upon the character and appearance of the site and the wider area including the strategic views into and out of the adjacent Conservation Area, neighbouring amenity, the standard of accommodation proposed, transport and sustainability.

### **Planning Policy**

#### Loss of Existing Office

- 8.4 The proposal includes the demolition of the existing two storey office building (Use Class B1). It is noted that there are discrepancies regarding the amount of existing office floor space provide within the various documentation submitted (stated to be 784m<sup>2</sup> in the application form/Design and Access Statement, 803m<sup>2</sup> in the Fludes Letter and 996m<sup>2</sup> in the Planning Statement), however such discrepancies do not prohibit the Local Planning Authority determining the application.
- 8.5 Policy EM3 of the Local Plan and CP3 of the Brighton & Hove City Plan Part One specifies that land in industrial use (Class B1, B2 and B8) or allocated for industrial purposes will not be released for other purposes unless the site has been assessed and found to be unsuitable for modern employment needs.
- 8.6 Policy EM5 of the Brighton & Hove Local Plan relates specifically to the change of use of redundant office floorspace and states planning permission will not be granted for the change of use of office premises or office sites to other purposes, unless they are genuinely redundant.
- 8.7 The policy qualifies how redundancy is determined. If redundancy is established preference is given to alternative employment generating uses; followed by affordable housing.

- 8.8 Within the information submitted as part of the application there are discrepancies between the dates provided regarding the marketing of the site in respect of the marketing details received from Fludes and a letter from the applicant.
- 8.9 The Council's Economic Development Officer comments that the property has also been listed on the Council's commercial property database since 9<sup>th</sup> December 2011 but no interest has been raised.
- 8.10 The applicant states that a national publishing business with a local presence was offered the entire building as a relocation option from their current premises however they chose not to pursue occupancy.
- 8.11 The submitted marketing particulars state that the Ground Floor level would be available from January 2013 however the marketing board seen on site during the recent Case Officer's Site Visit and the commercial property press adverts only refer to the first floor offices within the building.
- 8.12 The first floor level of the building has been marketed for a period of over twelve months; the ground floor level/entire building has not been marketed for such a period. As such the applicant cannot demonstrate that the use of the office space is no longer viable and to demonstrate that the use is genuinely redundant, contrary to policies EM3 and EM5 of the Brighton & Hove Local Plan and CP3 of the Brighton & Hove City Plan Part One.
- 8.13 It is noted that the Council's Economic Development Officer comments that the building's location is not best suited for modern business requirements as it is bordered by residential development and there is limited car parking available on site, which many business see as a requirement, unless in a City centre location with alternative parking provision provided or close proximity to Brighton Station. However it is not considered that these views negate the requirements of policies EM3 and EM5 of the Brighton & Hove Local Plan and CP3 of the Brighton & Hove City Plan Part One, with regards to demonstrating that the existing use is redundant and unsuitable for modern employment use, through a strategic marketing strategy of at least one year.
- 8.14 If the applicant had been able to demonstrate redundancy, student accommodation would not be the preferred use of the site.
- 8.15 It is acknowledged that the strategy of policy DA3 of Brighton & Hove City Plan Part One is to "further develop and enhance the role of Lewes Road as the City's academic corridor", as set out by the applicant, however part A3 of this policy indicates that one measure to achieve the overall strategy is by "encouraging the development of housing, employment floorspace ...". There is no conflict between policies Em3, EM5 and CP3.

Principle of student accommodation

- 8.16 The 2005 Brighton & Hove Local Plan does not specifically address the issue of purpose built student accommodation. This matter is however addressed in the emerging Brighton & Hove City Plan Part One in the form of policy CP21. It is

considered that in such a case, where the adopted Local Plan is silent on an issue, and the emerging City Plan provides specific policy, that this emerging policy should be given significant weight.

- 8.17 Policy CP21 seeks to support the provision of additional purpose built student accommodation across the city and is a criteria based policy;
1. Proposals should demonstrate that there will be no unacceptable impact upon residential amenity in the surrounding area through issues such as increased noise and disturbance;
  2. High density developments will be encouraged but only in locations where they are compatible with the existing townscape (see CP12 Urban Design);
  3. Sites should be located along sustainable transport corridors where accommodation is easily accessible to the university campuses or other educational establishments by walking, cycling and existing or proposed bus routes;
  4. Proposals should demonstrate that they would not lead to an unacceptable increase in on-street parking in the surrounding area;
  5. Proposals should be designed to be safe and secure for their occupants whilst respecting the character and permeability of the surrounding area;
  6. Schemes should have the support of one of the city's two Universities or other existing educational establishments within Brighton & Hove. The council will seek appropriate controls to ensure that approved schemes are occupied solely as student accommodation and managed effectively;
  7. Permanent purpose built student accommodation will not be supported on sites with either an extant planning permission for residential development or sites identified as potential housing sites.
- 8.18 Sites identified as potential housing sites will include those identified in other City Plan policies and those listed in the Strategic Housing Land Availability Assessment.
- 8.19 Issues regarding criteria 1 are discussed in detail below.
- 8.20 Within the Planning Statement submitted it is stated that the applicant would be happy for a condition to be attached to an approval to ensure that the accommodation "can only be occupied by higher or further education students" but it is also stated that "Restricting occupancy to a particular establishment would interfere with market competition and would be unreasonable...".
- 8.21 If overall the proposal was considered to be acceptable the Local Planning Authority would seek measures to ensure that the approved scheme would be occupied solely by students, through a S106 Agreement.
- 8.22 It is noted that a Typical/Sample Student Management Plan has been submitted as part of the Transport Statement, which is discussed in further detail below, and that it is stated that security and/or management staff would be available 24 hours a day as a neighbourhood contact point. However no form of Management Plan has been submitted in respect of the specific student accommodation proposed. It is expected that such a plan would set out measures to be implemented to ensure that neighbouring occupiers would not

suffer nuisance and harm. It would be necessary to ensure that the education provider/s of the students residing at the facilities are involved in the management of the premises, and take an element of responsibility for the students' behaviour and potential reprimands should behavioural problems/nuisance occur.

- 8.23 Securing a Management Plan for a student accommodation development is a nationally agreed appropriate method of monitoring and managing student accommodation particularly when the development is off campus and close to neighbouring private residences
- 8.24 Although it is acknowledged that the implementation of a Management Plan could be secured as part of a legal agreement, it is considered that the complete lack of any form of Management Plan, relating specifically to the site, results in the applicant failing to demonstrate that the proposed student accommodation would be managed effectively and, in conjunction with the proposal not being supported by one of the City's two Universities or other existing educational establishments within Brighton & Hove, the proposal is contrary to criterion 6 of policy CP21.
- 8.25 With regard to criterion 7 the site is not subject to an extant planning permission for housing however it is identified in the Council's Strategic Housing Land Availability Assessment (SHLAA) (December 2012) with potential for 12 units to come forward in the next 6 to 10 years. The proposal for purpose built student accommodation is therefore contrary to criterion 7 of policy CP21.

### **Design**

- 8.26 Policy QD3 of the Local Plan seeks the more efficient and effective use of sites, however, policies QD1 and QD2 require new developments to take account of their local characteristics with regard to their proposed design. QD4 seeks to preserve or enhance strategic views, the setting of landmark buildings and views in and out of conservation areas. Whilst QD5 seeks to ensure new developments present an interesting and attractive street frontage particularly at ground floor.
- 8.27 In particular, policy QD2 requires new developments to be designed in such a way that they emphasise and enhance the positive qualities of the local neighbourhood, by taking into account local characteristics such as height, scale, bulk and design of existing buildings, impact on skyline, natural and built landmarks and layout of streets and spaces.
- 8.28 The site is currently occupied by a two storey, white rendered, office building of 1920/30s style, known as Richmond House, which is sited immediately outside the Round Hill Conservation Area. The site fronts onto Richmond Road, the remainder of which is located within the Conservation Area, at its junction with D'Aubigny Road, which is also located within the Conservation Area. The existing building is not in keeping with the predominant character of the Round Hill Conservation Area, which consists of rendered terraced houses with pitched roofs, set behind small forecourted gardens with rendered boundary walls, and therefore no objections are raised to its demolition in design terms.

- 8.29 Although of a larger floor plate than the surrounding terraced properties, the height of the existing building, with a spot height of approximately 46.83 Above Ordnance Datum (AOD), is in keeping with the surrounding residential properties located in Richmond Road and D'Aubigny Road.
- 8.30 Due to the topography of the area, the existing building is prominent in views from the west of the site, down Richmond Road, in addition to being viewed against a backdrop of the houses and downland on the other side of the valley.
- 8.31 As previously stated the proposal comprises the construction of two blocks. Building 1 would be located on the northern side of the site, fronting onto the Sainsbury's Service Road and would be dug into the existing embankment. This results in Building 1 appearing as a 5 storey building when viewed from areas to the north but as a 3 storey building when viewed from areas to the south, including from areas within the Round Hill Conservation Area.
- 8.32 Building 1 has been designed to comprise 3 sections which allow the building to follow the curve of the Sainsbury's Service Road. Each section would be separated by glazed sections, which would result to internal corridor areas. It is stated that the inclusion of these glazed sections "breaks up the mass of the building". At the base of the building the brickwork would project at every second course, stated to "create a subtle but noticeably heavier base over the ground and first floors. The height of the base corresponds to the height of the change in level between the two roads". The design also includes windows which wrap around the north-western corner of the building, included to "emphasise the entrance to the building" and to "create a more active frontage and mark the prominent corner of the site".
- 8.33 Building 2 would be located in the south-western corner of the site, fronting D'Aubigny Road and would comprise of 3 storeys. The eastern corner of this proposed building would be chamfered.
- 8.34 The flat roof of Building 1 would measure 47.8 AOD (approximately 15.1m measured from northern elevation) whilst the flat roof form of Building 2 would measure 47.15 AOD (approximately 9.1m). The height of the two building would therefore slightly exceed the height of the existing office building, the main flat roof form of which measures 46.83 AOD.
- 8.35 Due to the siting of the proposed buildings in relation to one another, Building 2 would not be viewed independently of Building 1. The overall massing and bulk of Building 1 and the combined bulk and massing of Building 2 with Building 1 behind, is much greater than that of the existing office building.
- 8.36 It is noted that Building 1 would be excavated into the embankment located on the northern section of the site and therefore the lowest 2 floor levels would not be highly visible from D'Aubigny Road, Richmond Road or the Conservation Area. When viewed from within D'Aubigny Road/Richmond Road the proposed buildings would appear similar to the existing building with regards to overall height, thus intending also to be in keeping with the scale of the existing



terraced residential buildings in the Conservation Area. However, due to the design and size of the proposed development, which would be emphasized by the inclusion of a monolithic roofscape, the proposal in particular Building 1, would appear as a greater mass than the existing building, Richmond House, a mass which is considered to be excessive for the site, represent an over-development of the site and which would result in the development being prominent in views along Richmond Road and D'Aubigny Road, eastwards out of the Conservation Area

- 8.37 Despite the intention of the applicant regarding the design of the proposal to break up the mass of the building, discussed above, it is considered that the overall massing and bulk of the development should be reduced and that the design of the proposal should be amended to further break the bulk of the building down, introduce further vertical emphasis and to reflect the architecture of the adjacent Conservation Area.
- 8.38 Building 2 would front directly onto D'Aubigny Road and as a result is considered to relate to the existing streetscape of the surrounding streets. Building 1 however fronts onto the lower level Service Road and is set back from D'Aubigny Road/Richmond Road and as a result does not have a direct relationship with D'Aubigny Road/Richmond Road. The failure to relate to these roads results in Building 1 failing to be in keeping with the design and positioning of properties in Richmond Road/D'Aubigny Road and the surrounding Conservation Area, where the frontage of properties are located in close proximity to the related roads.
- 8.39 The height of the properties within the Round Hill Area relate to the gradient upon which they are located. Building 1 is higher than Building 2 and therefore fails to steep down in height from south to north to respect the gradient of the area and in particular the site.
- 8.40 A steep embankment currently separates the southern and northern parts of the site, the northern side being set at a much lower level. This existing embankment is part of a number of similar embankments within the area. These embankments, which are located in the general area of the former railway line, create an important distinction between the Conservation Area and the more varied character of the area located to the north of the site, which includes large modern warehouse style buildings, a new block of flats, Sainsbury's Service Road and more historic terraced houses.
- 8.41 Within the Round Hill Conservation Area Statement it is stated that "The Round Hill Conservation Area is notable for its hilly siting with long terraces of houses framing distant views of the sea to the south and of the downs to the east". As a result of the hilly nature of the Round Hill area and as a result of the abrupt land drop from the Conservation Area to Hughes Road "Views of the conservation area can therefore be found from other parts of Brighton, particularly from Bear Road to the east and Race Hill to the south-east...".
- 8.42 The Conservation Area Statement also describes the surviving railway line as "Round Hill's green corridor". This line and ribbons of green formed by the large

back gardens to the dwellings are prominent in views into the Conservation Area from areas to the east, such as from Bear Road and Race Hill Road. It is stated that “There are few visible trees, as most of the houses have no front gardens and the private gardens behind are largely screened from close public view. However there are some notable trees in the land just outside the conservation Area at then north-east end of Richmond Road..”, i.e. within the development site.

- 8.43 Although the proposal would not result in the complete excavation of the existing embankment, the construction of Building 1 would result in the obscuring of a majority of the embankment when viewed from areas to the north/north-east/east. The actual/visual loss of the embankment would erode the distinction between the Conservation Area and the surrounding less cohesive streetscape, located to the north of the site. In addition the loss of the embankment and the loss of the existing trees within the site would lead to the loss of greenery in both views from within the Conservation Area and views into the Conservation Area from areas to the north/east including from within longer views, such as from Bear Road or the Race Course. It is noted that the loss of the existing trees within the site, a total of 15 trees, is not objected to by the Council’s Arboriculturist for reason discussed in more detail below. Although replacement trees could be provided, due to the constraints of the site, replacement/additional planting and landscaping would not compensate for the actual/visual loss of the existing embankment.
- 8.44 The proposed buildings would be constructed of blue/grey brickwork, contrasting brick spandrel panels, bronze coloured aluminium windows sedum flat roofs, aluminium cladding and glass balustrades. The area between the two buildings would comprise a hard landscaped courtyard, in paviors to match the buildings, whilst soft landscape and planting would be provided along the site boundaries in addition to a brick boundary wall of approximately 0.6m along the frontage with Richmond Road/D’Aubigny Road.
- 8.45 The use of brick of a bluish colour is not a common material seen in the Conservation Area, it is considered by the Heritage Officer that render would be a more appropriate materials.
- 8.46 Overall it is considered that the proposal, by virtue of its design, finish materials, excessive bulk, scale and massing would be an over-development of the site, which would relate poorly to the terraced properties in D’Aubigny Road and Richmond Road, causing a harmful impact upon the visual amenities of the Richmond Road/D’Aubigny Road streetscenes and the wider area including the Round Hill Conservation Area and would fail to emphasis and enhance the positive qualities of the neighbourhood. The mass, scale and bulk of the development is substantially larger than the existing office building and would appear out of scale and overly prominent in views out of the Round Hill Conservation Area. The height of Building 1 fails to reflect the change in ground level across the site and fails to have a direct relationship with D’Aubigny Road/Richmond Road, a characteristic of the Conservation Area. In addition the actual/visual loss of the existing embankment would result in the erosion of the distinct barrier between the Conservation Area and the less

cohesive streetscape located to the north of the site, which would have a harmful impact upon the distinctive layout and predominance of green space of the area seen in longer views.

### **Amenity**

- 8.47 Policy QD27 of the Brighton & Hove Local Plan states that planning permission for any development or change of use will not be granted where it would cause material nuisance and loss of amenity to the proposed, existing and/or adjacent users, residents, occupiers or where it is liable to be detrimental to human health.

### Neighbouring Amenity

- 8.48 The Round Hill Area is currently a quiet and tranquil area, predominately residential in character, apart from the presence of the existing office building. It is noted that an industrial estate is also located to the north of the site however this estate is not accessible from the Round Hill Area.
- 8.49 There are discrepancies within the information submitted with regards to the use of the proposed entrance to be level with Richmond Road/D'Aubigny Road, on the southern side of Building 1, as it is stated within the application that multiple entrance are proposed to improve connectivity of the building with its surroundings however in another part of the application it is stated that the Richmond Road entrance/secondary entrance would be for use by staff only. It is considered that the use of Building 1's southern entrance, which is closer to part of the City centre, by occupiers and visitors of the building would have a significant adverse impact upon the amenities of neighbouring properties within the Round Hill Area, especially with regards to noise disturbance, due to the significant increase in footfall which would be created from the proposed development. Although it is acknowledged that conditions could be attached to an approval restricting the use of this door, the liability of the scheme with regards to access from this door to the proposed courtyard area, which could be intended to be used as an external amenity area or to potential disabled parking (issues discussed further below), does not allow the Local Planning Authority to assess what control could be implemented.
- 8.50 The Building Research Establishment (BRE) Report, 'Site layout planning for daylight and sunlight: A guide to good practice' states *"privacy of houses and gardens is a major issue in domestic site layout. Overlooking from public roads and paths and from other dwellings needs to be considered. The way in which privacy is received will have a major impact on the natural lighting of a layout. One way is by remoteness; by arranging for enough distance between buildings, especially where two sets of windows face each other. Recommended privacy distances in this situation vary widely, typically from 18m to 35m"*.
- 8.51 From the information submitted it is not apparent how the windows within the development would open or if any passive ventilation is proposed as part of the development. It is acknowledged that the provision of only part openable windows is preference for the City's two Universities, with regards to purpose built student accommodation, for reasons of safety and amenity. As previously

stated the application is not supported by either University or other existing educational establishment and therefore the preferences of a particular institution cannot be assessed and is a further issue of student accommodation management that is not clarified in the submission.

Sunlight/Daylight/Over-shadowing

- 8.52 As previously stated the proposal would result in a development with excessive bulk and massing, especially with regards to Building 1.
- 8.53 Due to the proposed development being located to the north/north-west of properties on Richmond Road and D'Aubigny Road it is not considered that the proposal would have a significant adverse impact upon the amenities of neighbouring properties located on these roads with regards to loss of sunlight/daylight or overshadowing.
- 8.54 Windows, including a bay window, are located within the northern elevation of no. 14 D'Aubigny Road however it is considered that any loss to levels of daylight to this neighbouring property and other southern/south-western neighbouring properties would not be so significant as to warrant refusal despite the slight increase in height of the buildings proposed.
- 8.55 Under application BH2010/00498 planning permission was granted for the redevelopment of the former Esso garage site, located between Hollingdean Road and the Sainsbury's Service Road, comprising of a part 2, 3, 4 and 5 storey building to provide 24 residential units. This development, which is nearing completion, comprises many windows in the southern elevations, some of which relate to flats with a single aspect. In addition this neighbouring development comprises external amenity spaces at ground floor/top floor levels and external balconies on the southern elevations. Due to the topography within the vicinity of the Sainsbury's Service Road the proposed 5 storey building would be higher than this northern neighbouring development. Given the siting of the proposed development in respect of this neighbouring development, the orientation of the sun and the proposed height, bulk, scale and massing of Building 1, it is considered that the proposal would have a significant adverse impact upon the amenities of his northern neighbouring property with regards to loss of sunlight/daylight and would create overshadowing to the outdoor amenity spaces and therefore would result in an unneighbourly form of development. No evidence to the contrary has been submitted as part of the application.
- 8.56 The other northern neighbouring properties and associated garden areas are located further away from the site, are set at a lower level than the wall located on the northern side of the Sainsbury's Service Road, which increases in height as it progresses west to east, and the built form of a garage located to the rear of nos. 1 to 6 May Cottages, Hollingdean Road. It is considered that the existing wall and built form of the garage would already affect the levels of daylight/sunlight received by the rear section of these neighbouring properties and therefore it is not considered that the proposal would have a significant adverse impact upon these neighbouring properties with regards to loss of sunlight/daylight.

Overlooking/Loss of Privacy

- 8.57 It is noted that the built form of Building 1 follows the curve of the Service Road. A minimum distance of approximately 14m would be located between the north/north-east facing elevation of Building 1 and the southern elevation of the new neighbouring property located to the north of the site. It is noted that the eastern section of the rear elevation of this property projects further to the south than the western side, the recessed elevation is located a minimum of approximately 18m from the proposed development. Windows relating to bedrooms/living rooms are located on the southern elevation of the flat development at all floor levels in addition to external balconies being present at first, second and third floor levels both on the projecting and recessed rear elevations. A private terrace is also located on the eastern side of this neighbouring building at fourth floor level in addition to private amenity spaces being located at ground floor level facing onto the Service Road, albeit slightly below the level of the Service Road.
- 8.58 Due to the limited distances that would be located between the southern elevations of the new development located to the north of the site and the north elevations of the proposed development, the presence of south facing windows, balconies and other amenity areas within the new flat development and the expanse of windows within the north facing elevations of the proposed development, it is considered that the proposal would result in actual and perceived over-looking and loss of privacy to the occupiers of the northern neighbouring flat development.
- 8.59 It is not however considered that the proposal would have a significant adverse impact upon the amenities of the occupiers of other properties on Hollingdean Road given the distances which would be located between the proposed development and these neighbouring properties.
- 8.60 No. 128 Richmond Road would be the nearest neighbouring property located to the south-western of the site. A distance of approximately 14m would be located between the western elevation of Building 2 and the nearest elevation of no. 128 Richmond Road, which contains a window at ground and first floor level. Although it is likely that these windows relate to habitable rooms it is not considered that the proposed development would result in increased overlooking or loss of privacy to this neighbouring property given the existing relationship with Richmond House and existing windows.
- 8.61 The southern elevation of Building 2 would be located approximately 6m from the northern elevation of no. 14 D'Aubigny Road. A window relating to the main corridor at all three floor levels would be located within the southern elevation of Building 2, facing onto 14 D'Aubigny Road. The plans submitted show these windows to be obscurely glazed, an issue which could be ensured via a condition in order to protect the amenities of the southern neighbouring property.
- 8.62 The chamfered elevation of Building 2 would contain 2 windows at each floor level, relating to the proposed common rooms. It is noted that these window would provide oblique views to the rear of no. 14 D'Aubigny Road and the



garden area of this neighbouring property. However Richmond House, which is located perpendicular to no. 14 and has a built form which extends along all but the western most part of the shared boundary between the two neighbouring properties, contains windows at ground and first floor levels which provide direct views towards this neighbouring property and therefore it is not considered that Building 2 would have a significant adverse impact upon the amenities of no. 14 D'Aubigny Road with regards to loss of privacy or overlooking.

- 8.63 A minimum distance of approximately 19.5m would be located between the rear elevation of no. 14 D'Aubigny Road and the south-west facing elevation of building. As a result of this distance and the oblique views which would be achievable it is not considered that Building 1 would have a significant adverse impact upon the amenities of no. 14 D'Aubigny Road with regards to loss of privacy or overlooking.

#### Management Plan

- 8.64 Although it is stated that security and/or management staff would be available 24 hours a day as a neighbourhood contact point no form of Management Plan has been submitted as part of the application. It is expected that such a plan would set out measures to be implemented to ensure that neighbouring occupiers would not suffer nuisance and harm. It would be necessary to ensure that the education provider/s of the students residing at the facilities are involved in the management of the premises, and take an element of responsibility for the students' behaviour and potential reprimands should behavioural problems/nuisance occur.
- 8.65 It is considered that the lack of any form of a Management Plan relating specifically to the proposal results in the applicant failing to demonstrate that the proposed development complies with policies of the Brighton & Hove Local Plan and policies of the Brighton & Hove City Plan Part One, for reasons discussed elsewhere in this report.

#### Future Occupiers

- 8.66 Building 1 would provide 129 studio/self-contained units (each with their own en-suite, dining and kitchenette areas), a lift providing access to each floor level, reception area, office/security room, laundry room, plant room, guest WC, common room and area for the storage of 186 cycles whilst Building 2 would provide 3 cluster flats, each containing 5 en-suite bedrooms with shared kitchen/dining/siting room facilities (it is noted on the plans submitted that no physical access is provided into the proposed kitchen/dining/siting room facilities).
- 8.67 Although the proposal would result in the provision of 129 self-contained units, all with double beds, as previously stated the occupancy of the building solely by students could be controlled.
- 8.68 Building 1 would contain 5 rooms which are stated to be 'accessible rooms', 2 on the first floor level and one at second, third and third floors. These rooms would be located closest to the lift area. Within the Design and Access

Statement it is stated how the Building and 'accessible rooms' would comply with Part M of the Building Regulations.

- 8.69 Based on the type of development as purpose built student accommodation, shared amenity space is considered acceptable rather than seeking private space for each unit. As part of the application a common room would be provided at ground floor level within Building 1 whilst a shared living/dining room would be provided on each cluster flat in Building 2. It is disappointing that a common room is not provided on each floor level of Building 1.
- 8.70 In addition a paved courtyard/parking area would be provide between the two buildings, level with Richmond/D'Aubigny Road however it is not clear from the information provided whether the applicant intends this area to be used as a formal amenity area by the students.
- 8.71 The quality of amenity spaces is important. If it is the intention of the applicant that the paved area between the buildings would provide external amenity space for the occupants it is considered that this area is of poor quality and unusable. The proposed courtyard area would also provide parking for 3 vehicles, possibly for disable parking, an issue discussed in further detail below. If all three parking spaces are occupied by vehicles then the courtyard area is divided into two.
- 8.72 A potential issue with the use of the paved courtyard area as an external amenity area is the impact from noise disturbance to neighbouring properties and future occupiers of the development and overlooking of future occupiers, particularly those occupying bedrooms/units adjacent to this area. it is acknowledged that measures such as restricting the hours of use of the courtyard area could mitigate the impacts of is use as an amenity space of the occupiers of neighbouring properties, including the development itself however due to the limited detail provided the Local Planning Authority is unable to assess the impacts in full or recommend mitigation measures.
- 8.73 Brighton & Hove Local Plan policy HO6 requires that new residential development provides outdoor recreational space, specifying that 2.4 hectares per 1000 population accommodated within the development should be provided. Such provision is not proposed as part of the application. In recognition that development schemes will seldom be capable of addressing the whole requirement on a development site, the policy allows for contributions towards the provision of the required space on a suitable alternative site. A contribution towards off-site improvements is therefore recommended to address the requirements of policy HO6. In this case the contribution required towards sport, recreation and open space is £173,309.21. Such a contribution could be secured by legal agreement were approval to be recommended.
- 8.74 As the application is not supported by one of the City's existing educational establishments and is speculative, the proposed accommodation cannot be assessed with regard to the accommodation standards adopted by the various establishments. However the Local Planning Authority is able to assess some aspects of the standard of accommodation proposed.

- 8.75 Due to parts of Building 1 being excavated into the existing embankment the accommodation on the southern side of the building, at first floor level, would face onto a lightwell area (no accommodation is proposed on the southern side of the ground floor level as this area provides the cycle storage facilities). This accommodation would be entirely below the Richmond/D'Aubigny Road street level. A glass balustrade of approximately 1.1m high would be located along the southern edge of the light well (the northern side of the proposed courtyard area). It is considered that the first floor south-west facing accommodation would have an oppressive outlook, resulting in a sense of enclosure and would receive poor levels of sunlight/daylight as a result of their positioning and proximity in respect of the retained part of the embankment, and in some cases the presence of the proposed adjacent 3 storey building (Building 2) which would further block light/sunlight, and the provision of the proposed glass balustrade. As a result it is considered that the south-west facing ground floor accommodation would provide substandard accommodation and an unpleasant living environment.
- 8.76 The north-east facing elevation of Building 1 would face onto the Service Road related to the adjacent supermarket, Sainsbury's. Comments regarding the impacts on the amenities of the future occupiers of the development from delivery lorries utilising this road are noted. Deliveries to Sainsbury's are current restricted to between 7am and 9pm Monday to Friday and only 2 deliveries are allowed between 10am and 4pm on Sundays' and Bank Holidays. As a result of the current restrictions on the delivery hours to the adjacent supermarket, it is not deemed that the amenities of the students would be significantly affected by the proximity of the rooms within the northern section of Building 1 with the existing Service Road.

Plant Room/Lift

- 8.77 A plant room would be provided at ground floor level within Building 1 in addition to a lift providing access between all floor levels within this building.
- 8.78 If the application was to be recommended for approval the Council's Environmental Health Officer has requested that conditions be imposed to ensure suitable levels of sound insulation are provided between the plant and the accommodation, in order to protect the amenities of future occupiers.

**Sustainable Transport**

- 8.79 Policy TR1 of the Local Plan requires development proposals to provide for the demand for travel which they create and maximise the use of public transport, walking and cycling. Policy TR7 will permit developments that would not increase the danger to users of adjacent pavement, cycle routes and roads.

Car parking:

- 8.80 Policy HO7 will grant permission for car free housing in locations with good access to public transport and local services and where there are complementary on-street parking controls and where it can be demonstrated that the development will remain genuinely car-free over the long term.

- 8.81 3 off-street parking spaces are proposed as part of the development, accessed from Richmond/D'Aubigny Road. It is stated on the relevant plan that these spaces would provide 'Changeover Parking'. No other general off-street parking is proposed in connection with the development. In regard to general parking provision policy TR19 and SPGBH4 specify maximum standards rather than minimum and therefore the level of off-street parking proposed is acceptable provided that no displacement occurs and acceptable provision is made for sustainable methods.
- 8.82 On the 30<sup>th</sup> April 2013 the Council's Transport Committee approved an extension Zone J of the Cities Controlled Parking Zone (CPZ) in order to include the Round Hill Area. With the implementation of such parking controls the Council can ensure that future residents of the proposed student accommodation are ineligible to buy resident parking permits. The extension to zone J would however not cover Hughes Road/Service Road, although it is noted that these roads are subject to Double Yellow Line Restrictions.
- 8.83 In addition, within the submitted Transport Statement it is stated that a clause would be included within the Student Tenancy Agreement which 'prohibits students ... from bringing cars to the site, bringing cars to the surrounding area and bringing cars into the City Centre in general'.
- 8.84 In order to ensure that the development remained car free it would be recommended that any consent, if overall the proposal was deemed acceptable, be accompanied by a legal agreement requiring the applicants to seek to amend the relevant TRO to remove the eligibility of residents for residents parking permits and that appropriate prohibition for cards is also secured.

Cycle Parking:

- 8.85 186 cycle parking spaces would be provided at ground floor level within Building 1. The level of provision is considered acceptable however as the facilities are proposed to be double stacked, which are not always deemed acceptable or useable, it would be recommended that a condition requiring further details of the proposed facilities, insurance that the system installed would spring loaded or of a similar mechanism and that a notice is erected with the instructions of use to assist usability and encourage full uptake of the stands, be attached were approval to be recommended.

Disabled parking:

- 8.86 As set out above Building 1 includes the provision of 5 rooms referred to as accessible rooms, however no dedicated disabled parking provision is indicated on the plans provided. There is no specific requirement within SPG4 for disabled parking in relation to student accommodation however some provision would be required. The measures identified in policy TR18 as alternatives to on site provision are not applicable in this case. It is noted that the 3 parking spaces proposed off Richmond/D'Aubigny Road could be widened in order to provide disabled parking provision. Should the application overall be deemed acceptable it is recommended that the provision of disabled parking and its implementation are identified in the management plan, which would be requested via S106 Agreement.

Traffic Impact

- 8.87 In order to address the trip generation associated with the proposed development it is recommended that a financial contribution (£51,345) towards sustainable transport infrastructure in the vicinity of the site, namely in and around Vogue Gyrotory, is required. Such a contribution could be secured by legal agreement were approval to be recommended.

Transport Management/Travel Plan

- 8.88 Within the submitted Transport Statement an extract of a Traffic/Parking Management Plan for student accommodation elsewhere in the country has been provided. This extract relates to the arrangement for the arrival and departure strategy for such accommodation. The Council's Transport Officer has stated that the submitted extract indicates that the applicant have a thorough and professional approach to arrangements at other similar facilities and that a specific plan for the Richmond Road site would be requested via a condition, as part of a comprehensive management plan for the development.
- 8.89 It is acknowledged that the implementation of the recently approved CPZ within the area would reduce the scope for vehicles to park within Richmond Road/D'Aubigny Road at the start/end of term. With regards to Hushes Road/Service Road the Council's Transport Officer states that there is adequate space on these roads to allow for deliveries as it is legal to actively load and unload from double yellow lines provided that there is no loading ban and no obstruction is created. The Transport Officer states that these would apply to a majority of Hughes Road as it is an industrial estate.
- 8.90 No management strategy, which includes details of start and end of term arrangements, have been provided for the Richmond House site setting out the exact arrangements for the proposal including arrangements for the start and end of term. As set out previously the plans submitted indicate the provision of 3 parking spaces, accessed via D'Aubigny Road/Richmond Road as 'Changeover Bays'. The Local Planning Authority is concerned that the use of D'Aubigny Road/Richmond Road by all occupants of the building at the beginning/end of term, could have a significant adverse impact upon the amenities of neighbouring properties, with regards to noise disturbance, even if managed so that arrival/departure times are staggered, given the existing tranquil nature of the area.
- 8.91 A Travel Plan, which could be submitted as part of an overall Management Plan should be submitted in respect of the proposal. Subsequent reviews of such Travel Plan could be incorporated into the Travel Plan of the appropriate university/college travel plan.

Servicing/Deliveries

- 8.92 The applicant states that all deliveries would take place via the Hughes Road access either via use of the existing double yellow lines, which can be used for unloading/loading where there is no loading ban, or via a dedicated loading bay, if such a bay is required.



- 8.93 As set out below the proposed refuse store would be located on the southern side of Building 1 and therefore would be accessed from the D'Aubigny Road/Richmond Road. The Council's City Clean officer has concerns regarding parking restrictions at the site with regards to the collection of refuse and recycling and vehicles being able to pull into the site and not block the road for long periods of time. Further details of parking restrictions along the kerbside of the site would be required.
- 8.94 Further details of delivery arrangements should form part of an overall Management Plan for the site, a document which can be required if overall the proposal is deemed acceptable.
- 8.95 The plans submitted show the provision of retractable bollards along part of the Richmond Road frontage, the positioning of which would need to be amended in order to address concerns raised by the Council's Transport Officer with regards to preventing vehicles causing an obstruction on the footway.

**Sustainability**

- 8.96 Policy SU2 seeks to ensure that development proposals are efficient in the use of energy, water and materials. Proposals are required to demonstrate that issues such as the use of materials and methods to minimise overall energy use have been incorporated into siting, layout and design.
- 8.97 As a major scheme, the development is expected to meet standards set out in the Council's SPD08 on Sustainable Building Design, of BREEAM 'excellent', to a minimum of 60% score in energy and water sections and a feasibility study on rainwater harvesting and grey water recycling systems.
- 8.98 A Sustainability Checklist has been submitted in which it is stated that the proposal would achieve BREEAM 'very good' which is below the expected standard. No justification for this lower level has been submitted as part of the application. It is noted that with regards to the energy and water sections, the applicant is intending to achieve 60%.
- 8.99 It is acknowledged that the Council's Sustainability Officer has stated that although a BREEAM assessment for the whole scheme is acceptable, the applicant should check that the BREEAM Multi-residential is the appropriate assessment tool with regards to Building 2, which would provide 3 floors of 5 cluster flats. If it is considered that Building 2 should be assessed under the Code for Sustainable Homes than this element of the proposal should meet Code Level 4 in order to comply with SPD08.

Waste Management:

- 8.100 Under legislation introduced on the 6<sup>th</sup> April 2008, in the form of Site Waste Management Plans Regulations 2008, the proposed development is of a scale which would require a Site Waste Management Plan; therefore it is not deemed necessary to secure any details of waste minimisation measures under this application for planning permission.

Refuse Storage

- 8.101 Externally accessed refuse storage would be provided on the Richmond Road frontage of Building 1, at second floor level.
- 8.102 The proposed store would measure approximately 10m<sup>2</sup>. The Council's City Clean Officer has stated that such storage facilities are not large enough to accommodate refuse storage for a development of the size and scale proposed. Based on calculations using data from Sussex University, each student would require 0.7 litres of an 1100 litre bin. As the Council cannot offer a collection more frequently than once a week, based on the aforementioned calculation, the proposal would require 25 1100 litre bins.
- 8.103 For 25 bins with a footprint of 1.28m<sup>2</sup> per bin, an initial floor space of 32m<sup>2</sup> would be required however to allow manoeuvrability this needs to be multiplied by 2.5 as required by PAN05. Therefore to meet requirements based on a weekly collection the proposed bin store, for 144 residents, would need to be 80m<sup>2</sup>.
- 8.104 It is acknowledged that the applicant could arrange for private refuse and recycling collections but no details of such arrangements have been provided as part of the application.
- 8.105 The failure to provide adequate refuse and recycling facilities would have a harmful impact upon the amenities of future occupiers of the development and surrounding properties, contrary to policies SU9 and QD27 of the Brighton & Hove Local Plan and PAN 05.

**Landscaping and Ecology**

- 8.106 As part of the application a Tree Survey has been submitted. 15 trees would be removed as part of the proposed development, including 13 trees which are covered by a Tree Preservation Order (TPO), located on a linear formation at the top of the bank, on the eastern side of the site. The root system of the trees covered by the TPO have been severely undermined on the downward slope and above them is a concrete hardstanding area, which is a harsh environment and is unlikely to contain many roots.
- 8.107 Seven of the cluster of 13 trees are categorised in the report as "R" trees, trees which are in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years (e.g. trees that have serious irremediable, structural defects, trees that are in decline and trees infected with pathogens). The other 6 trees covered by the TPO have been categorised as "C" trees, trees of low quality with an estimated remaining life expectancy of at least 10 years, unremarkable trees of very limited merit or impaired condition.
- 8.108 The Council's Arboriculturist's has reviewed the submitted document and agrees fully with its contents namely that the 13 trees within the site covered by the current TPO are now in such a condition that they do not warrant such a status and as a result there are no objections raised to their removal.

- 8.109 One of the trees not covered by the TPO is categorised as category “C” tree and therefore no objection to the loss of this tree is raised.
- 8.110 The other tree within the site not covered by the TPO has been given a “B” tree category, which is for trees of a moderate quality with a life expectancy of at least 20 years, trees of some significance with remedial defects or lacking that special quality. The Council’s Arboriculturist’s states that this Sycamore is of fine form but it has grown in a brick planter of some 2m diameter, meaning its root system is likely to be inadequate and is not sitting in the planter symmetrically, it is within 50cms of the brickwork on two sides. While this tree could be retained post-development, it is questioned whether its position in the planter is viable long-term and for this reason no objection is raised to its proposed removal.
- 8.111 The loss of 15 tree on one site is not normally something that the Council’s Arboriculturist would countenance, however given that all but one of the trees within the site are diseased, rotten or have large areas of exposed heartwood, it is agreed that that they can be removed, subject to an exceptional and robust landscaping scheme for replacement trees a part of any development, an issue which can be ensured via a condition if overall the proposal is deemed acceptable.
- 8.112 The comments received by the Council’s Heritage Officer regarding the impact on the Conservation Area of the removal of the existing trees are noted however given the condition of the trees it is not considered that their retention could be justified.
- 8.113 In addition to the loss of the Sycamore trees mentioned above the proposal would also result in the loss of dense stands of Bramble covering approximately 400m<sup>2</sup>, chiefly in the area of the existing steep bank facing Hughes Road. However this is a habitat of relatively recent origin and it is of low species diversity. The Council’s Ecologist has stated that this existing habitat may be of some value at the site level for feeding and nesting birds but its loss would not justify refusal of the application on nature conservation grounds. It is however recommended that, if overall the application is deemed acceptable, a condition is attached prohibiting the removal of the existing habitat during the bird nesting season (1<sup>st</sup> March to 31<sup>st</sup> July).
- 8.114 Policy QD17 of the Brighton & Hove Local Plan requires compensating and equivalent nature conservation features to be provided for any that are lost or damaged as part of a development. In this application wall-mounted bird nest boxes should be included in the development proposals to help compensate for the loss of potential bird nesting habitat, an issue which could be resolved via a condition.
- 8.115 In addition to protecting existing nature conservation features, policy QD27 also requires development to incorporate new nature conservation features to enhance the nature conservation value of the site, a requirement supported by the NPPF (paragraph 118).

- 8.116 Annex 6 of the Council's SPD on Nature Conservation and Development quantifies the mount of new nature conservation features developments are expected to provide, based on the area of the development. In this case 1,662 'nature points' would be required (equivalent to a site area of 1,662m<sup>2</sup>). A Sedum green roof (approximately 780m<sup>2</sup>) is proposed as part of the application. This equates to 5,460 'nature points' which is substantially more than required to address policy with regards to nature conservation enhancement. Further information regarding the proposed Sedum green roof is required, information which can be requested by a condition if overall the proposal was deemed acceptable.

**Other Considerations:**

Local Employment/Training

- 8.117 Should the application be approved, the Developer Contributions Interim Technical Guidance, Local Employment and Training provides the supporting information to request a contribution through a S106 agreement to the Local Employment Scheme. In this instance a financial contribution of £7,840 would be sought.
- 8.118 An Employment and Training Strategy would also be required, with the developer committing to using an agreed percentage of local labour. It is requested that in respect of the proposed development 20% local employment it utilised during the construction phase.

Public Art

- 8.119 Local Plan policy QD6 states that the provision of public art will be sought from major development schemes although the type of public art and level of contribution will vary depending on the nature of the development proposal, the characteristics of the site and its surroundings.
- 8.120 No acknowledgment of policy QD6 has been made within the application however an 'artistic component schedule' can be included as part of a S106 agreement, including a contribution of £30,000 towards the provision of public art, if overall the proposal is deemed acceptable, in order to ensure that the proposal complies with policy QD6.

Land Contamination

- 8.121 The site has had a long history of development including as Lewes Road Station, a Goods Station and a manufacturing chemist, such uses may have resulted in localised land contamination. In addition the site is located close to other potentially contaminated land sites. As a result it recommended that an approval be subject to a full contaminated land condition.

Infrastructure

- 8.122 Southern Water has stated that currently there is inadequate capacity in the local network to provide foul sewage disposal to service the proposed development. The proposed development would increase flows to the public sewage system and existing properties and land may be subject to a greater risk of flooding as a result.

- 8.123 The public sewer is a combined system, receiving both foul and surface water flows and no flows greater than currently received can be accommodated in this system. However, it is possible that by removing some of the existing surface water entering the sewer, additional foul flows could be accommodated, i.e. no net increase in flows. As an alternative, additional off-site sewers, or improvements to existing sewers can be provided to service the development.
- 8.124 Should the application receive planning approval it is requested that a condition is attached requiring details of the proposed means of foul and surface water sewerage disposal to be submitted to and approved in writing.

### **Planning Obligations**

- 8.125 As detailed above, to deliver compliance with Local Plan Policies, financial contributions would be required towards Local Employment Scheme (£7,840) sustainable transport infrastructure (£51,345), sports recreation and open space (£173,309.21), and public art (£30,000), and the provision of an Employment and Training Strategy with the developer committing to using 20% local employment during the construction phase would be sought. Were approval to be recommended, such measures could be secured as part of a planning legal agreement. Were agreement not to be reached in regard to these issues, the proposal would be considered contrary to policies QD6, QD28 and HO6 of the Brighton & Hove Local Plan.

## **9 CONCLUSION**

- 9.1 The applicant has failed to demonstrate that the existing office building is longer viable and genuinely redundant.
- 9.2 The proposal for purpose built student accommodation on a site which is identified as having potential for housing provision in the Council's Strategic Housing Land Availability Assessment, would compromise the Council's ability to meet its housing targets, and would set an unwelcome precedent for the approval of student accommodation on other comparable sites across the city in the future. For this reason the proposed development is considered to be unacceptable in principle.
- 9.3 It is considered that the proposed development would be an over-development of the site and by virtue of its design, scale, bulk and massing would have a harmful impact upon the visual amenities of the D'Aubigny Road and Richmond Road streetscenes and the wider area including the Round Hill Conservation Area and longer views into the Conservation Area.
- 9.4 The applicant has failed to demonstrate that the development would adequately address issues of sustainability, refuse/recycling storage and protect the amenities of the neighbouring properties with regards to increased noise and disturbance, levels of daylight/sunlight received and overshadowing created. The proposal would result in actual and perceived overlooking and loss of privacy to the northern neighbouring property and would not provide an acceptable standard of accommodation to all future occupiers.



- 9.5 Overall it is considered that the scheme is unacceptable and contrary to policy. Refusal of planning permission for the reasons identified in Section 11 below is therefore recommended.

## **10 EQUALITIES**

- 10.1 The development should be designed to be fully accessible for residents and visitors alike.

## **11 REASONS FOR REFUSAL / INFORMATIVES**

### **11.1 Reasons for Refusal:**

1. The proposed purpose built student accommodation is not supported by one of the City's two Universities or other existing educational establishments within Brighton & Hove. The proposal would have an unacceptable impact upon residential amenity in the surrounding area, especially with regards to increased noise and disturbance as a result of the applicant failing to submit a management plan specific to the site. In addition part of the proposed development would occupy a site which is identified as having potential for housing provision in the Council's Strategic Housing Land Availability Assessment, and would therefore compromise the Council's ability to meet its housing need and set an unwelcome precedent for the approval of student accommodation on other housing sites across the City in the future. For these reasons the proposed development is contrary to the National Planning Policy Framework, policy QD27 of the Brighton & Hove Local Plan and policies CP1 and CP21 of the Brighton & Hove City Plan Part One.
2. The proposed development, by virtue of its design, finish materials, excessive bulk, scale and massing would be an over-development of the site, which would relate poorly to the terraced properties in D'Aubigny Road and Richmond Road, causing a harmful impact upon the visual amenities of the Richmond Road/D'Aubigny Road streetscenes and the wider area including the Round Hill Conservation Area and would fail to emphasis and enhance the positive qualities of the neighbourhood. The mass, scale and bulk of the development is substantially larger than the existing office building and would appear out of scale and overly prominent in views out of the Round Hill Conservation Area. The height of Building 1 fails to reflect the change in ground level across the site and fails to have a direct relationship with D'Aubigny Road/Richmond Road, a characteristic of the Conservation Area. In addition the actual/visual loss of the existing embankment would result in the erosion of the distinct barrier between the Conservation Area and the less cohesive streetscape located to the north of the site, which would have a harmful impact upon the distinctive layout and predominance of green space of the area seen in longer views. The proposal is therefore contrary to development plan policies QD1, QD2, QD3, QD4 and HE6 of the Brighton & Hove Local Plan.
3. The applicant has failed to demonstrate that the existing B1 office use is no longer viable and genuinely redundant by failing to market the ground floor/entire building on competitive terms for a period of at least twelve months. In the absence of such evidence, the proposal would involve the

unacceptable loss of employment generating floorspace. As such the proposal is contrary to policies EM3 and EM5 of the Brighton & Hove Local Plan and policy CP3 of the Brighton & Hove City Plan Part One.

4. The applicant has failed to demonstrate that the proposed development would not have a significant impact upon the amenities of the new development located to the north of the site, between Hollingdean Road and Sainsbury's Service Road, with regards to received levels of daylight/sunlight and over-shadowing. The proposed massing, scale and bulk of Building 1 is considered to result in an unneighbourly form of development which is considered likely to have an adverse effect on the amenities of the neighbouring northern development by way of loss of daylight/sunlight, especially in respect of the single aspect flats. The proposal is also considered to give rise to adverse actual and perceived loss of privacy and overlooking to windows, balconies and terraced area on the southern elevation of this neighbouring property. As such the proposal is contrary to policy QD27 of the Brighton & Hove Local Plan and CP21 of the Brighton & Hove City Plan Part One.
5. Insufficient information has been provided with regards to the use of secondary entrance of Building 1 onto Richmond Road and the use of the Courtyard area and as such the applicant has failed to demonstrate that the proposed development would not have a significant adverse upon the amenities of occupiers of the neighbouring properties and future occupiers of the development, with regards to noise and disturbance. As such the proposal is contrary to policies SU9, SU10 and QD27 of the Brighton & Hove Local Plan and policy CP21 of the Brighton & Hove City Plan Part One.
6. The south facing accommodation within Building 1, at first floor level, would be provided with poor levels of daylight/sunlight and oppressive outlook resulting in a sense of enclosure. As such the proposal would provide a poor standard of accommodation harmful to the amenity of future occupiers. As such the proposal is contrary to policy QD27 of the Brighton & Hove Local Plan.
7. The proposed development would not provide a level of sustainability which would adequately address the requirements of policy SU2 of the Brighton & Hove Local Plan and the guidance set out in SPD08 'Sustainable Building Design'. Furthermore sufficient justification has not been provided to demonstrate that the level of sustainability recommended in SPD08 could not reasonably be met. The proposal is therefore contrary to policy SU2 of the Brighton & Hove Local Plan and SPD08 on 'Sustainable Building Design'.
8. The applicant has failed to demonstrate that adequate refuse and recycling provision would be provided. The proposed refuse store is not large enough for a development of the size proposed based on a weekly collection by the Council. No details of private refuse and recycling collections have been submitted as part of the application. Failure to provide adequate refuse and recycling facilities would have a harmful impact upon the amenities of future occupiers of the development and neighbouring properties As such the proposal is contrary to policies SU9 and QD27 of the Brighton & Hove Local Plan and PAN 05 on Design Guidance for the Storage and Collection of Recyclable Materials and Waste.

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Informatives:

1. In accordance with the National Planning Policy Framework and Policy SS1 of the Brighton & Hove City Plan Part One (submission document) the approach to making a decision on this planning application has been to apply the presumption in favour of sustainable development. The Local Planning Authority seeks to approve planning applications which are for sustainable development where possible.
  
2. This decision is based on the drawings listed below:

<b>Plan Type</b>	<b>Reference</b>	<b>Version</b>	<b>Date Received</b>
Site and Block Plan	0565 F0-001	P2	8 <sup>th</sup> February 2013
Proposed Site and Block Plan	0565 D0-001	P1	23 <sup>rd</sup> January 2013
Existing Floor Plans	0565-F0-100	P1	23 <sup>rd</sup> January 2013
Existing Elevations	0565-F0-101	P1	23 <sup>rd</sup> January 2013
Topographical Survey	0565-F0-102	P1	23 <sup>rd</sup> January 2013
Proposed Level 00 – Hughes Road Level	0565 D0-100	P1	23 <sup>rd</sup> January 2013
Proposed Level 01	0565 D0-101	P1	23 <sup>rd</sup> January 2013
Proposed Level 02 – Richmond Road Level	0565 D0-102	P1	23 <sup>rd</sup> January 2013
Proposed Level 03	0565 D0-103	P1	23 <sup>rd</sup> January 2013
Proposed Level 04	0565 D0-104	P1	23 <sup>rd</sup> January 2013
Proposed Roof Plan	0565 D0-105	P1	23 <sup>rd</sup> January 2013
Proposed Elevations	0565 D0-200	P1	23 <sup>rd</sup> January 2013
Proposed Elevations and Sections	0565 D0-201	P1	23 <sup>rd</sup> January 2013
Proposed Elevations and Sections	0565 D0-202	P1	23 <sup>rd</sup> January 2013
Proposed Elevations (Building 2)	0565 D0-203	P1	23 <sup>rd</sup> January 2013
Proposed Bay Detail	0565 D0-204	P2	8 <sup>th</sup> February 2013

**Appendix A - Letters of Objection**

Property Name	Street	Town	Postcode
Flat 3, 2	Ashdown Road	Brighton	BN2 3FN
3	Ashdown Road	Brighton	BN2 3FS
4	Ashdown Road	Brighton	BN2 3FS
7	Ashdown Road	Brighton	BN2 3FS
9	Ashdown Road	Brighton	BN2 3FS
10	Ashdown Road	Brighton	BN2 3FS
11	Ashdown Road	Brighton	BN2 3FS
13	Ashdown Road	Brighton	BN2 3FS
2	Belton Road	Brighton	BN2 3RE
48	Benett Drive	Hove	BN3 6UT
2	Brock End	Cuckfield	RH17 5BU
Unit 11	Centenary Industrial Estate	Brighton	BN2 4AW
6	Champions Row, Wilbury Avenue	Hove	BN3 6AZ
12	Church Lane	Southwick	BN42 4GD
31	Crescent Road	Brighton	BN2 3RP
37C	Crescent Road	Brighton	BN2 3RP
68	Crescent Road	Brighton	BN2 3RA
1	D'Aubigny Road	Brighton	BN2 3FT
3 (x2)	D'Aubigny Road	Brighton	BN2 3FT
4	D'Aubigny Road	Brighton	BN2 3FT
5 (x2)	D'Aubigny Road	Brighton	BN2 3FT
6A	D'Aubigny Road	Brighton	BN2 3FT
Flat 6, 6	D'Aubigny Road	Brighton	BN2 3FT
Flat 8, 6	D'Aubigny Road	Brighton	BN2 3FT
7	D'Aubigny Road	Brighton	BN2 3FT
8 (x2)	D'Aubigny Road	Brighton	BN2 3FT
9 (x2)	D'Aubigny Road	Brighton	BN2 3FT
12	D'Aubigny Road	Brighton	BN2 3FT
13	D'Aubigny Road	Brighton	BN2 3FT
15	D'Aubigny Road	Brighton	BN2 3FT
72	Ditchling Road	Brighton	BN1 4SG
313	Kingsway	Hove	BN3 4LT
3	Mayo Road	Brighton	BN2 3RJ
14	Mayo Road	Brighton	BN2 3RJ
29 (x2)	Prince's Crescent	Brighton	BN2 3RA
33	Prince's Crescent	Brighton	BN2 3RA
61 (x2)	Prince's Crescent	Brighton	BN2 3RA
77	Prince's Crescent	Brighton	BN2 3RA
91	Prince's Crescent	Brighton	BN2 3RA
93	Prince's Crescent	Brighton	BN2 3RA
24	Prince's Road	Brighton	BN2 3RH
36	Prince's Road	Brighton	BN2 3RH

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36B	Prince's Road	Brighton	BN2 3RH
43 (x2)	Prince's Road	Brighton	BN2 3RH
49	Prince's Road	Brighton	BN2 3RH
50	Prince's Road	Brighton	BN2 3RH
55 (x2 incl. committee member of The Round Hill Society)	Prince's Road	Brighton	BN2 3RH
68	Prince's Road	Brighton	BN2 3RH
4 (x2)	Richmond Road	Brighton	BN2 3RN
6	Richmond Road	Brighton	BN2 3RN
7	Richmond Road	Brighton	BN2 3RL
11A	Richmond Road	Brighton	BN2 3RL
25	Richmond Road	Brighton	BN2 3RL
26 (x2)	Richmond Road	Brighton	BN2 3RN
27	Richmond Road	Brighton	BN2 3RL
32	Richmond Road	Brighton	BN2 3RN
35	Richmond Road	Brighton	BN2 3RL
37	Richmond Road	Brighton	BN2 3RL
39	Richmond Road	Brighton	BN2 3RL
45	Richmond Road	Brighton	BN2 3RL
46	Richmond Road	Brighton	BN2 3RN
47 (x2)	Richmond Road	Brighton	BN2 3RL
49 (x2)	Richmond Road	Brighton	BN2 3RL
51	Richmond Road	Brighton	BN2 3RL
52	Richmond Road	Brighton	BN2 3RN
53	Richmond Road	Brighton	BN2 3RL
55	Richmond Road	Brighton	BN2 3RL
58	Richmond Road	Brighton	BN2 3RN
59	Richmond Road	Brighton	BN2 3RL
62	Richmond Road	Brighton	BN2 3RN
66	Richmond Road	Brighton	BN2 3RN
80 (x2)	Richmond Road	Brighton	BN2 3RN
82B	Richmond Road	Brighton	BN2 3RN
84 (x3)	Richmond Road	Brighton	BN2 3RN
94	Richmond Road	Brighton	BN2 3RN
100	Richmond Road	Brighton	BN2 3RN
102 (x2)	Richmond Road	Brighton	
106 (x2)	Richmond Road	Brighton	BN2 3RN
108 (x2)	Richmond Road	Brighton	BN2 3RN
110	Richmond Road	Brighton	BN2 3RN
112 - 114	Richmond Road	Brighton	Bn2 3RN
122	Richmond Road	Brighton	BN2 3RN
126	Richmond Road	Brighton	BN2 3RN
18	Roundhill Crescent	Brighton	BN2 3FR
30	Roundhill Crescent	Brighton	BN2 3FR
34	Roundhill Crescent	Brighton	BN2 3FR
45	Roundhill Crescent	Brighton	BN2 3FR



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47	Roundhill Crescent	Brighton	BN2 3FQ
53	Roundhill Crescent	Brighton	BN2 3FQ
54	Roundhill Crescent	Brighton	BN2 3FR
61	Roundhill Crescent	Brighton	BN2 3GP
71	Roundhill Crescent	Brighton	BN2 3GP
78a (x2)	Roundhill Crescent	Brighton	BN2 3FR
79	Roundhill Crescent	Brighton	BN2 3GP
81	Roundhill Crescent	Brighton	BN2 3GP
82A	Roundhill Crescent	Brighton	BN2 3FR
85	Roundhill Crescent	Brighton	BN2 3GP
97	Roundhill Crescent	Brighton	BN2 3GP
101 (x2)	Roundhill Crescent	Brighton	BN2 3GP
101C	Roundhill Crescent	Brighton	BN2 3GP
103A	Roundhill Crescent	Brighton	BN2 3GP
105	Roundhill Crescent	Brighton	BN2 3GP
Flat 3, 105	Roundhill Crescent	Brighton	BN2 3GP
Flat 4, 105	Roundhill Crescent	Brighton	BN2 3GP
Flat 1, 107	Roundhill Crescent	Brighton	BN2 3GP
Flat 3, 107	Roundhill Crescent	Brighton	BN2 3GP
111	Roundhill Crescent	Brighton	BN2 3GP
113	Roundhill Crescent	Brighton	BN2 3GP
Basement Flat, 113	Roundhill Crescent	Brighton	BN2 3GP
Unknown	Roundhill Crescent	Brighton	
8	Round Hill Street	Brighton	BN2 3RG
51	Upper Lewes Road	Brighton	BN2 3FH
62	Warleigh Road	Brighton	BN1 4NS
6 (x2)	Wakefield Road	Brighton	BN2 3FP
10	Wakefield Road	Brighton	BN2 3FP
13	Wakefield Road	Brighton	BN2 3FP
28	Wakefield Road	Brighton	BN2 3FP
Unknown	Unknown	Brighton	BN2 3FT
Unknown	Unknown	Brighton	BN2 3GP
Unknown	Unknown	Unknown	Unknown

