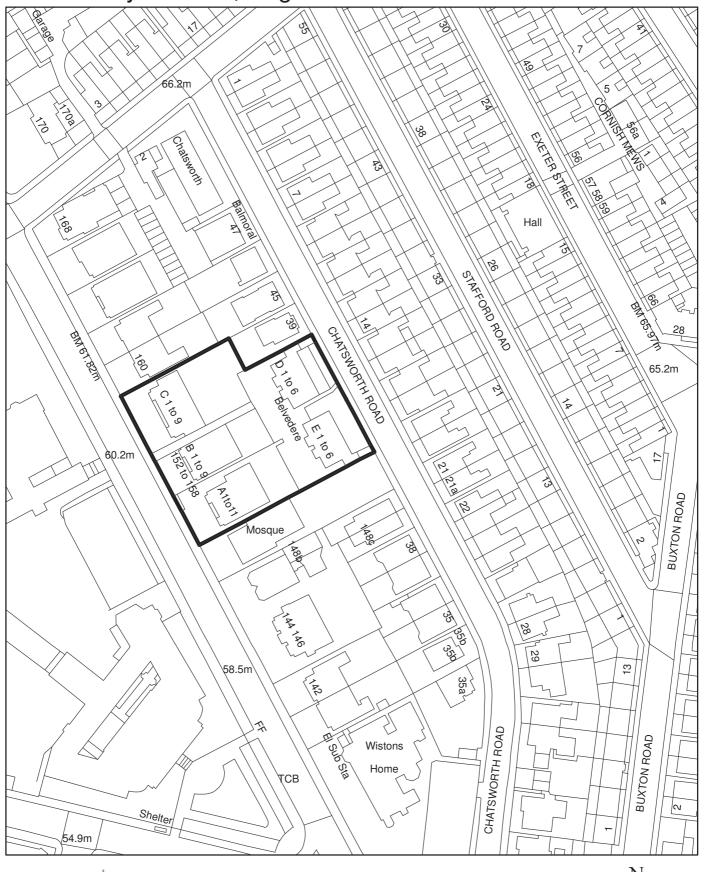
### ITEM F

# Blocks A B & C Belvedere, 152-158 Dyke Road, Brighton

BH2014/03968 Full planning

## BH2014/03968 Blocks A, B & C Belvedere, 152-158 Dyke Road, Brighton.







**Scale:** 1:1,250

No: BH2014/03968 Ward: PRESTON PARK

App Type: Full Planning

Address: Blocks A B & C Belvedere 152-158 Dyke Road Brighton

Proposal: Erection of additional storey to blocks A, B and C to create 5no

two bedroom and 1no one bedroom flats (C3) (2no additional

flats per block). Erection of bicycle store.

Officer: Adrian Smith Tel 290478 Valid Date: 09 December

2014

<u>Con Area:</u> N/A <u>Expiry Date:</u> 03 February

2015

Listed Building Grade: N/A

**Agent:** Lewis and Co Planning SE Ltd, 2 Port Hall Road, Brighton

BN1 5PD

**Applicant:** Windlesham Finance Company Ltd, Mr Michael Lovegrove

C/O Lewis and Co Planning SE Ltd, 2 Port Hall Rd, Brighton

BN1 5PD

#### 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 be MINDED TO GRANT planning permission subject to a S106 agreement and the Conditions and Informatives set out in section 11.

#### 2 SITE LOCATION & DESCRIPTION

- 2.1 The application site comprises three three-storey purpose built blocks of flats located on the east side of Dyke Road, opposite BHASVIC. The blocks form buildings A, B & C of the Belvedere complex, with blocks D & E to the rear fronting Chatsworth Road. Communal gardens sit between these sets of buildings.
- 2.2 The site is bordered by substantial two storey pitched roof buildings to the north and south. The northern building adjacent forms residential flats whilst the southern building adjacent forms a mosque.

#### 3 RELEVANT HISTORY

3.1 None relevant

#### 4 THE APPLICATION

4.1 Planning permission is sought for the erection of an additional storey to blocks A, B & C comprising five two-bedroom flats and one one-bedroom flat. An associated building for cycle parking is also proposed to the rear of the communal gardens rear of block C.

## 5 PUBLICITY & CONSULTATIONS External

- 5.1 Neighbours: Nineteen (19) letters of representation have been received from the occupiers of Flats A8 (x4), A9, C1, C5, C6, C7 (x2), C9, D3, D5 Belvedere; 4 The Croft Chatsworth Road; 18 Chatsworth Road; 15 Frith Road; 21 Furness House, Abbotts Manor, London; 1 Hadleigh Close, London; and Unknown objecting to the application for the following reasons:
  - The extension will alter and jar with style and character of the existing blocks
  - An additional storey would not be in keeping with the area which comprises two storey houses
  - Tall buildings are not in keeping with the area
  - Increased bulk and overbearing impact on adjacent buildings
  - Overdevelopment
  - Increased noise and disturbance from occupiers. There are existing noise issues between floors due to lack of soundproofing
  - Increased noise and disturbance from construction works
  - The buildings have not been designed to take the extra load of an additional storey
  - Building works will infringe on privacy and will create dust and debris. The gardens will be unsafe
  - Insufficient sound insulation between floors
  - Loss of daylight and sunlight, including to the communal gardens
  - Loss of light to common areas of the buildings
  - Overshadowing
  - Overlooking between buildings and from the terraces to the balconies below
  - Loss of view
  - Additional rent and maintenance costs for residents
  - Insufficient bin storage
  - Increased security issues
  - No solar panels are proposed to help reduce bills or other sustainability measures
  - Scaffolding will create a fire hazard by blocking escape routes
  - There is no wheelchair access to the building and upper floors
  - No affordable housing is proposed
  - Insufficient parking, including disabled parking
  - Stairways do not comply with building regulations for fire escapes
  - Insufficient plans
  - Insufficient bicycle storage for 47 apartments
  - Improvements should be made to blocks D & E
  - Loss of skylights to stairwells
  - Breach of Protocol 1, Article 1 of the Human Rights Act and right to a peaceful enjoyment of permissions
  - The development does not accord with the space standards set out in the Housing Act and does not support Priorities 1 & 3 of the Brighton & Hove Housing Strategy 2015.

5.2 **Councillor Kennedy** has <u>objected</u>. A copy of the letter is attached to this report.

Internal:

- 5.3 Environmental Health: Examined no comment
- 5.4 **Sustainable Transport:** No objection

No objection subject to a contribution of £4,500 towards sustainable transport infrastructure along Dyke Road, and a revised cycle store that provides for better access and easier storage.

5.5 **Access:** No objection

#### 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) is a material consideration.
- 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)

Brighton & Hove Local Plan:

TR1	Development and the demand for travel			
TR7	Safe development			
TR14	Cycle access and parking			
TR19	Parking standards			
SU2	Efficiency of development in the use of energy, water and materials			
SU13	Minimisation and re-use of construction industry waste			
QD1	Design – quality of development and design statements			
QD2	Design – key principles for neighbourhoods			
QD3	Design – efficient and effective use of sites			
QD14	Extensions and alterations			
QD27	Protection of Amenity			
HO3	Dwelling type and size			
HO4	Dwelling densities			
HO5	Provision of private amenity space in residential development			
HO7	Car free housing			
HO13	Accessible housing and lifetime homes			

#### Supplementary Planning Guidance:

SPGBH4 Parking Standards

#### Supplementary Planning Documents:

SPD08 Sustainable Building Design

SPD12 Design Guide for Extensions and Alterations

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

SS1 Presumption in Favour of Sustainable Development

#### 8 CONSIDERATIONS & ASSESSMENT

- 8.1 The main considerations in the determination of this application relate to the principle of adding an additional storey to each block, the impact on the appearance of each building and the wider street scene, impact on the amenities of adjacent occupiers, the standard of accommodation to be provided, and transport and sustainability matters.
- 8.2 At present, there is no agreed up-to-date housing provision target for the city against which to assess the five year housing land supply position. Until the City Plan Part 1 is adopted, with an agreed housing provision target, appeal Inspectors are likely to use the city's full objectively assessed need (OAN) for housing to 2030 (estimated to fall within the range 18,000 24,000 units) as the basis for the five year supply position. The Local Planning Authority is unable to demonstrate a five year supply against such a high requirement. As such, applications for new housing development need to be considered against paragraphs 14 and 49 of the NPPF. These paragraphs set out a general presumption in favour of sustainable development unless any adverse impacts of development would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole. The merits of the proposal are considered below.

#### 8.3 **Design and Appearance:**

The Belvedere estate comprises five three-storey purpose built blocks of flats. Blocks A, B & C front Dyke Road, with blocks D & E to the rear fronting Chatsworth Road. Communal gardens sit in between, with access paths running through the site between each block.

- 8.4 There is no objection in principle to adding an additional storey to blocks A, B & C, subject to the resultant buildings sitting appropriately within the Dyke Road street scene and not harming the amenities of adjacent occupiers, including those within the existing development.
- 8.5 All three blocks are completed in brick with tile hung bay windows and UPVC windows. Blocks A & B are deeper than block C and include front balconies and rendered sections to the front and side elevations. The additional storeys to each block would be rendered and would all take broadly the same form, being inset 3m from the front elevation, between 1m and 2m from the side elevations, and set behind 1.2m high brick parapets. The rear elevations would be flush to the rear of each building and be completed in brick to match. Block C would have a projecting brick stairwell to the front owing to the existing internal configuration of the building.
- In design terms the additional storeys would be suitably scaled and subordinate additions relative to each host building, with all fenestration broadly aligning with the main elevations to each building. Within the wider Dyke Road street scene the additional storeys would sit above the ridge line to both adjacent buildings but within the wider context would not be so dominate or out of scale as to warrant the withholding of permission. The east side of Dyke Road is varied in character with a mix of two storey pitched roof buildings, three storey flat roofed blocks of flats (including Belvedere), and three storev converted blocks of flats with additional accommodation at roof level. As such the consistency of building form and scale is varied. The additional storeys are set back 3m from the front of each block and largely disguised behind the 1.2m high brick parapets. The parapets would limit the visibility of the set back top floors within the street scene such that their additional height relative to the adjacent buildings would not be readily appreciable or harmful. In longer views the additional storeys would be set against taller buildings at 144-148 Dyke Road to the south, and opposite the substantial buildings that form BHASVIC. For these reasons the proposed additional storeys are considered to represent appropriately scaled and design additions that would not be harmful to the appearance of each block or the wider street scene, in accordance with policies QD1, QD2, & QD14 of the Brighton & Hove Local Plan.
- 8.7 To the rear, a covered cycle store is proposed along the rear boundary with 39 Chatsworth Road set 2.4m high on the boundary rising to 3m. The scale and position of this store would not harm the appearance of the site.

#### 8.8 Standard of Accommodation:

The six units would comprise five two-bedroom flats and one, one-bedroom flat. The general size and layout of each flat is acceptable, with each room having

good access to natural light and ventilation. Each unit would have a private west facing balcony to comply with policy HO5, whilst a condition is attached to ensure the development meets lifetime homes standards in accordance with policy HO13.

8.9 Residents have identified that the building and upper floors are inaccessible for wheelchair users, and that the proposal fails to meet the space standards set out in the Housing Act. The Housing Act does not form adopted policy in local or national planning policy. The size of the units are considered acceptable when placed against development plan policy and would provide a good standard of accommodation for future occupiers. In this instance, given that the additional units are reliant on the existing building, it is considered appropriate to require that Lifetime Homes standards are met where reasonably possible.

#### 8.10 Impact on Amenity:

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.

- 8.11 The main impact would be on the existing residents of the five Belvedere buildings and on the amenities of the flats within 160 Dyke Road adjacent to the north. The Mosque to the south would be largely unaffected as it extends further to the rear with no principal side facing windows.
- 8.12 The layout of the flats is such that there would be some degree of inter-overlooking between side facing bedroom and kitchen windows. This is though an existing common arrangement on all floors between blocks A, B & C therefore any harm would be no greater than established, with the separation between windows greater than on the lower floors given the set backs introduced from the sides. Likewise the greater massing of the additional parapet heights and additional storey would not reduce light to the existing side facing windows to a significant or harmful degree. Concern has been raised over overlooking between the proposed front terraces and the balconies below, however this is not considered to result in an unduly unusual or harmful arrangement for a residential block of flats such as this.
- 8.13 To the rear, block D & E are set at a separation of 20.6m from block A & B, and 27.2m from block C. This separation, which includes tall evergreen trees rear of block B, is sufficient to ensure that any overlooking potential is no greater than that which already exists between the blocks. Similarly the separation of 20m from block C to the rear of 39 Chatsworth Road is sufficient to ensure that any overlooking impact is not substantially greater than existing. The separations between blocks A, B & C and the buildings to the rear is sufficient to ensure that the additional storeys do not reduce light or outlook to an appreciable degree.
- 8.14 To the north, 160 Dyke Road has been subdivided into flats, with a maisonette within a rear outrigger. Block C is currently set close to the south side elevation of this building and imposes on light and outlook to all side windows, which include a main stairwell window, a habitable window in the side gable, and two habitable

windows within the outrigger. Given the close proximity, the additional parapet height of 1.1m would sit well above the majority of the side windows to 160 Dyke Road and as such would not have a significantly greater impact than that afforded by the existing arrangement. The additional storey would be inset 1.4m from the edge of the side parapet thereby ensuring the lower parapet bears the main impact. The gable window would be most impacted, however it would retain good light and would not be so impacted as to warrant the withholding of permission. The two windows in the outrigger would sit broadly level with the rear elevation to Block C, retaining angled aspect over the rear communal gardens.

- 8.15 Residents have identified that sound insulation between floors is poor and are concerned that an additional storey would create the same noise disturbance issues currently experienced. The Building Regulations require a standard of sound insulation between floors significantly in excess of the standard when the buildings were constructed in the 1950s. Such standards are considered appropriate in this instance to insure appropriate insulation of noise between the additional storey and residents below. Concern has also been raised at disturbance from construction works therefore it is considered reasonable in this instance to require a Construction and Environment Management Plan to be submitted to help mitigate any undue harm.
- 8.16 Subject to these conditions the proposed development would not result in a significant or harmful loss of amenity to existing residents, in accordance with policy QD27 of the Brighton & Hove Local Plan.

#### 8.17 Sustainable Transport:

Policies TR1 and TR7 aim to ensure that proposals cater for the demand in traffic they create, and do not increase the danger to users of adjacent pavements, cycle routes and roads.

- 8.18 The site is within Controlled Parking Zone Q, in a sustainable location along public transport routes and within walking distance of the city centre and railway stations. The proposal will provide no onsite parking for the residential units however given that the development would form an extension to an existing residential development, it would be unreasonable to make the occupants ineligible for parking permits as would otherwise be required under policy HO7.
- 8.19 The Sustainable Transport officer has raised no objection to the proposal, identifying that an additional 6 units would likely result in 3 additional cars based on 2011 census data for the area.
- 8.20 The cycle store has been amended during the course of the application to provide horizontal racks rather than vertical racks. The plans detail provision for 18 bicycles however realistically only 9 bicycles will be accessible in the tandem arrangement proposed. This exceeds the requirement of 8 bicycle parking spaces as set out in SPGBH4 and is secured by condition.
- 8.21 In order to offset the travel demand the additional units would create, a contribution of £4,500 towards sustainable transport infrastructure along Dyke Road is sought. This is secured in the s106 heads of terms. Subject to the s106

contribution and the recommended conditions the proposal would accord with policies TR1, TR7, TR14 & TR19 of the Brighton & Hove Local Plan.

#### 8.22 **Sustainability:**

Policy SU2 and SPD08 requires efficiency of development in the use of energy, water and materials and recommends that residential developments of this number should achieve Level 3 of the Code for Sustainable Homes (CSH). This is an appropriate mechanism given that the proposed dwellings would be stand alone additions atop the existing building.

8.23 The application is supported with a Sustainability Checklist which details that all 6 properties will meet level 3 of the Code for Sustainable Homes. This is secured by condition. No details of refuse and recycling facilities have been included with the application, with the design and access statement stating that existing open informal storage areas in the rear part of the site would be used. This is not considered an appropriate arrangement therefore details of more formalised refuse and recycling facilities are sought by condition.

#### 8.23 Other matters:

Representations have been received stating that the scheme should provide affordable housing. The application is for six units, thereby falling below the thresholds set out in development plan policy whereby a proportion of affordable housing should be sought. Matters relating to means of fire escape are addressed separately under the Building Regulations.

8.24 The advice of the Head of Law has been sought on the assertion by an objector that the development would breach his human right of entitlement to the peaceful enjoyment of his possessions. The Head of Law has advised that successful reliance on this right in the European Court of Human Rights is very rare and particularly so when the breach complained of is in relation to a Member State's implementation of its town planning policy. It is not considered that the Courts would find that the development proposed by the application would be a breach of human rights.

#### 9 CONCLUSION

9.1 The additional storeys to the three buildings would not substantially harm the character of the street or the amenities of adjacent residents, would provide a suitable standard of accommodation for future occupiers, and would meet the transport demand it would generate, in accordance with development plan policies.

#### 10 EQUALITIES

10.1 The development is required to meet Lifetime Homes standards.

#### 11 PLANNING OBLIGATION / CONDITIONS / INFORMATIVES

#### 11.1 S106 Heads of Terms

• A contribution of £4,500 towards sustainable transport infrastructure

#### 11.2 Regulatory Conditions:

- 1) The development hereby permitted shall be commenced before the expiration of three years from the date of this permission.
  - **Reason**: To ensure that the Local Planning Authority retains the right to review unimplemented permissions.
- 2) The development hereby permitted shall be carried out in accordance with the approved drawings listed below.
  - **Reason:** For the avoidance of doubt and in the interests of proper planning.

Plan Type	Reference	Version	Date Received
Site and block plan	TA802/01	С	09/12/2014
Existing site survey	TA802/02	-	26/11/2014
Existing elevations	TA802/03	-	26/11/2014
	TA802/04	-	26/11/2014
Existing floor plans blocks A-C	TA802/05	-	26/11/2014
	TA802/06	-	26/11/2014
	TA802/07	_	26/11/2014
Existing elevations blocks A-C	TA802/08	_	26/11/2014
	TA802/18	_	26/11/2014
	TA802/19	-	26/11/2014
Existing elevations block A	TA802/09	_	26/11/2014
	TA802/20	-	26/11/2014
Existing elevations block B	TA802/10	-	26/11/2014
	TA802/21	-	26/11/2014
Existing elevations block C	TA802/11	-	26/11/2014
	TA802/22	-	26/11/2014
Existing floor plans block A	TA802/12	_	26/11/2014
	TA802/13	-	26/11/2014
Existing floor plans block B	TA802/14	-	26/11/2014
	TA802/15	-	26/11/2014
Existing floor plans block C	TA802/16	-	26/11/2014
	TA802/17	-	26/11/2014
Existing section block A	TA802/23	-	26/11/2014
Proposed floor plans blocks A-C	TA802/30	В	03/02/2015
	TA802/31	_	26/11/2014
	TA802/32	-	26/11/2014
	TA802/33	-	26/11/2014
Proposed elevations blocks A-C	TA802/34	В	03/02/2015
	TA802/41	В	03/02/2015
	TA802/42	В	03/02/2015
Proposed elevations block A	TA802/35	Α	26/11/2014
	TA802/43	Α	26/11/2014
Proposed elevations block B	TA802/36	Α	26/11/2014
	TA802/44	Α	26/11/2014
Proposed elevations block C	TA802/37	Α	26/11/2014
	TA802/45	Α	26/11/2014

Proposed floor plans block A	TA802/38	-	26/11/2014
Proposed floor plans block B	TA802/39	-	26/11/2014
Proposed floor plans block C	TA802/40	-	26/11/2014
Proposed section block A	TA802/46	Α	26/11/2014
Proposed bicycle store plans and	TA802/47	Α	03/02/2015
elevations			

3) Other than amenity spaces to the front of the buildings as detailed on drawing nos TA802/33, TA802/38, TA802/39 and TA802/40 received on 26 November 2014, access to the flat roofs to the buildings shall be for maintenance or emergency purposes only and the flat roofs shall not be used as a roof garden, terrace, patio or similar amenity area.

**Reason**: In order to protect adjoining properties from overlooking and noise disturbance and to comply with policies QD14 and QD27 of the Brighton & Hove Local Plan.

The external finishes of the development hereby permitted shall match in material, colour, style, bonding and texture those of the existing building. **Reason**: To ensure a satisfactory appearance to the development in the interests of the visual amenities of the area and to comply with policies QD1 and QD14 of the Brighton & Hove Local Plan.

#### 11.3 Pre-Commencement Conditions:

- No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include:
  - a) a scheme of how the contractors will liaise with local residents to ensure that residents are kept aware of site progress and how any complaints will be dealt with reviewed and recorded (including details of any considerate constructor or similar scheme)
  - b) a scheme of how the contractors will minimise complaints from neighbours regarding issues such as noise and dust management vibration site traffic and deliveries to and from the site
  - c) details of hours of construction including all associated vehicular movements
  - d) details of the construction compound
  - e) a plan showing construction traffic routes

The construction shall be carried out in accordance with the approved CEMP.

**Reason:** In the interests of amenity and highway safety, to comply with policies QD27, SU10, SR18, SU9 and TR7 of the Brighton & Hove Local Plan.

6) Unless otherwise agreed in writing by the Local Planning Authority, no residential development shall commence until a Design Stage/Interim Code for Sustainable Homes Certificate demonstrating that the development achieves a Code for Sustainable Homes rating of Code level 3 as a minimum for all residential units has been submitted to, and approved in writing by, the Local Planning Authority.

A completed pre-assessment estimator will not be acceptable.

**Reason**: To ensure that the development is sustainable and makes efficient use of energy, water and materials and to comply with policy SU2 of the Brighton & Hove Local Plan and Supplementary Planning Document SPD08 Sustainable Building Design.

7) No development shall take place until a scheme for the storage of refuse and recycling has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be carried out in full as approved prior to first occupation of the development and the refuse and recycling storage facilities shall thereafter be retained for use at all times.

**Reason**: To ensure the provision of satisfactory facilities for the storage of refuse and to comply with policy QD27 of the Brighton & Hove Local Plan.

#### 11.4 Pre-Occupation Conditions:

- 8) Unless otherwise agreed in writing by the Local Planning Authority, none of the residential units hereby approved shall be occupied until a Final/Post Construction Code Certificate issued by an accreditation body confirming that each residential unit built has achieved a Code for Sustainable Homes rating of Code level 3 as a minimum has been submitted to, and approved in writing by, the Local Planning Authority.
  - **Reason**: To ensure that the development is sustainable and makes efficient use of energy, water and materials and to comply with policy SU2 of the Brighton & Hove Local Plan and Supplementary Planning Document SPD08 Sustainable Building Design.
- 9) The development hereby permitted shall not be occupied until the cycle parking facilities shown on the approved plans have been fully implemented and made available for use. The cycle parking facilities shall thereafter be retained for use by the occupants of, and visitors to, the development at all times.

**Reason**: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than private motor vehicles and to comply with policy TR14 of the Brighton & Hove Local Plan.

10) The new dwellings hereby permitted shall be constructed to Lifetime Homes standards prior to their first occupation and shall be retained as such thereafter.

**Reason:** To ensure satisfactory provision of homes for people with disabilities and to meet the changing needs of households and to comply with policy HO13 of the Brighton & Hove Local Plan.

#### 11.5 Informatives:

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 to grant Planning Permission has been taken:
- (i) having regard to the policies and proposals in the National Planning Policy Framework and the Development Plan, including Supplementary Planning Guidance and Supplementary Planning Documents:

  (Please see section 7 of the report for the full list); and
- (ii) for the following reasons:-The additional storeys to the three buildings would not substantially harm the character of the street or the amenities of adjacent residents, would provide a suitable standard of accommodation for future occupiers, and would meet the transport demand it would generate, in accordance with development plan policies.



#### **COUNCILLOR REPRESENTATION**

From: Amy Kennedy

Sent: 07 January 2015 11:22

To: Adrian Smith

Subject: BH2014/03968: Blocks A B & C Belvedere 152-158 Dyke Road

#### Dear Adrian

As ward councillor for Preston Park, I would be grateful if you could note my objection to Planning Application BH2014/03968: Blocks A B & C Belvedere 152-158 Dyke Road. I feel this scheme would result in inappropriate development if granted permission, for the following reasons:

- The proposals represent over-development in terms of height, scale, bulk and design, contrary to Local Plan policies QD1 Design - quality of development, and QD2 Design - key principles for neighbourhoods;
- The addition of an extra story to each existing block would result in significant noise disturbance, and loss of privacy and amenity, to neighbouring properties, contrary to Local Plan policy QD14 Extensions and Alterations;
- The scheme would result in material nuisance and loss of amenity to existing residents, contrary to Local Plan policy QD27 Protection of amenity.

I would also respectfully request that this application be considered by the Planning Committee should the recommendation be to grant permission, and wish to reserve my right to speak at the meeting where this item

Many thanks & best wishes Amy

Amy Kennedy

Green Councillor for Preston Park Ward Brighton & Hove City Council