



# Appeal Decisions

Inquiry held on 2, 3, 4 & 5 March 2010

Site visit made on 5 March 2010

by **John Papworth** DipArch(Glos) RIBA

an Inspector appointed by the Secretary of State  
for Communities and Local Government

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**Decision date:**  
**1 April 2010**

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## Appeal A: APP/Q1445/A/09/2111696

### Park House, Old Shoreham Road, Hove, East Sussex BN3 6HU

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Hyde Martlett against the decision of Brighton & Hove City Council.
- The application Ref BH2008/03640, dated 20 November 2008, was refused by notice dated 2 March 2009.
- The development proposed is redevelopment of the site to provide a mixed tenure development of 72 residential units.

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## Appeal B: APP/Q1445/A/09/2117222

### Park House, Old Shoreham Road, Hove, East Sussex BN3 6HU

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Hyde Housing Association (Hyde Martlett) against the decision of Brighton & Hove City Council.
- The application Ref BH2009/01464, dated 17 June 2009, was refused by notice dated 11 November 2009.
- The development proposed is redevelopment of the site to provide 72 residential units.

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## Application for Costs

1. At the Inquiry an application for costs was made by Hyde Martlett against Brighton & Hove City Council. This application is the subject of a separate Decision.

## Decisions

2. I dismiss both Appeal A and Appeal B.

## Main Issues

3. A main issue in both appeals is;
    - The effect of the development on the character and appearance of the area including the park and neighbouring buildings.
  4. In addition, in Appeal A only;
    - The amount and quality of play space.
    - The amount and quality of amenity space.
    - The effect of the development on the aims of policies that promote sustainable forms of development.
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## Reasons

### *Character and Appearance*

5. The existing buildings on the site are to be removed and as they are neither listed as being of architectural or historic interest nor sited within a conservation area, that may occur without further consent within the planning regime. However, I consider it appropriate to have regard to the contribution that the buildings and spaces around them make to the character and appearance of the area. Park House is attractive and distinctive and its siting within a westward view along Old Shoreham Road plays a part in the setting of Hove Recreation Ground and provides an urban edge to the wide expanse of that main road. Any new structure on this part of the site should, in my judgement, provide that edge and be a feature of interest.
6. The other buildings approaching the corner with Goldstone Crescent from both directions are less attractive and are poorly related to the urban grain, as well as to the Hove Park setting. The strong lines of the Hove Park Manor block of flats is lessened as the corner is approached and the turn into Old Shoreham Road is weak and poorly accomplished; the need in my opinion here is not for further open space but for a positive corner of built form to enclose the wide open spaces to the west. The failings of an open edge are well demonstrated by the development on the retail park opposite the south end of Hove Park. I attach limited weight to the 'dip' referred to by the appellant as variety in roofline can be welcome, whether up or down. I find the contribution of Park House positive but that of the remainder of the built form on the site negative.
7. The site is within the urban area and is previously developed land. Whilst the bus route along Old Shoreham Road is only hourly in each direction, another more frequent service is within walking distance to the east and a 'Metro' service of six buses an hour crosses Old Shoreham Road to the west. Hove mainline station is close-by to the south. I consider this the type and location of site that is suitable for residential re-development to a higher density in order to make the best use of land, to reduce pressure on less well-suited or countryside sites and to contribute to the provision of the supply of housing in the city, all in line with Local Plan Policy QD3 and advice in Planning Policy Statement 3 "*Housing*". Nevertheless, that statement of Central Government policy makes clear that there is a need for housing to be of a high quality, well designed and which is well integrated with, and complements the neighbouring buildings and the local area.
8. There is variety in the local area although particular character areas have been identified in the Council's appraisal. There is low density generally to the north, made up of individual houses, but this tightens in the vicinity of the site by the development of the neighbouring blocks of flats. On the south of Old Shoreham Road there is the more tightly developed area including Fonhill Road. In architectural and townscape terms I find the appeal site to have little relationship with the lower density housing to the north, separated as it is by the flat blocks, and that the relationship with housing to the south of Old Shoreham Road is reduced by the width of the road and the strong sense of similarity displayed within that group of buildings. I see no compelling reason for the treatment of the appeal site to be similar to the treatment of either of

- the adjoining building forms as such, but that there is a need for the new building to mediate between the separate characters and appearances.
9. Hove Park is a dominant feature of the area and new development should respond to it. The recent Orchard House and City Park to the west of that open space is of particular interest as I consider it successful. However, that development is of a significant size and spread over a number of blocks, some linked. To a great extent I find this development to form its own setting and as such can succeed without needing to respond to the surrounding townscape to the same extent as the appeal site should. Were that other development to be of a single block I am of the view that it would risk appearing incongruent.
  10. One further observation before I consider the detail of the proposals; it was stated by a representative of local residents that the appellant's photomontages incorrectly continued to show trees on the site which would be removed. There was some discussion over whether this was the case and whether trees to the rear of the buildings in those views, either on Hove Park or Hove Recreation Ground, would occupy the same space above and beyond the building. It was clear at the site inspection that from the viewpoints chosen those further trees would be insufficiently tall to do this. I shall therefore take account of this when considering the information on the photomontages.
  11. **Scheme 1, Appeal A.** In plan form I consider it appropriate that the building be sited as proposed, closer to the road at the junction and leaving less open land to its south and west boundaries. Both the Old Shoreham Road and Hove Park provide enough open space to compensate for this move and the resulting corner location would improve on the weakness that I have previously identified with the present building. The proposals to bring the building forward in relation to Hove Park Manor is also welcome; whilst I am not persuaded that the 'bookend' needs to be wholly covered, doing so creates no harm in my opinion and the west facing block would relate well to the line of Fonthill Road, making a link with that strong building form.
  12. In the easterly direction I consider the location of the corner at the junction of Hove Park Road and the main road correct in re-establishing a feature to replace Park House in the view along the road, and the slight angle part way along the south side, in order to achieve a right angled south west corner and yet still follow the road, would add interest. I have studied the Figuregram in the Council's proof of evidence and find that whilst there would be change, it would not be harmful, the 'u' shaped block would form a coherent perimeter to the wider urban block, appropriate to this margin with the two roads and the recreation ground. The placement of the block would, I consider, allow a spacious inner courtyard and the multiple circulation cores would limit the depth of the blocks, providing the maximum of external wall and light to the flats.
  13. That acceptable plan form would be translated into a five storey block stepping twice on the Old Shoreham Road elevation, appropriate in my view to respond to the rise in the ground level. The five storeys would be arranged as a ground floor likened to a plinth, forming a base for the building and recognising the way in which ground levels underpin the accommodation at Hove Park Manor on one side and Fonthill Road on the other. There is no need to do likewise

with ground levels on the appeal site, but to differentiate this level with a set back and shadows I find attractive. Above that would be three largely repeating levels of accommodation with themes of projecting render, balconies, a lively disposition of windows and adjoining coloured panels with projecting *brise soleil* topped by a firm line of masonry. These levels would be well-articulated and pleasing additions to the street scene on all elevations.

14. Above that level would be a mostly glazed top storey, set back and having a varied but flat roof-line. The appellant had shown a relationship between these undulations and the rhythm of sloping roofs on housing to the south but I find this link tenuous and not readily appreciated. The variety would break up the line of the top, but would, along with the varied glazing and varied vertical wall treatment, introduce what I view as an over-strident, inharmonious mixture of planes, colours, textures, possibly reflectivity, and lighting effects all at odds with the well-ordered repetition below. I find the photomontages '*view north along Fonthill Road*' and '*view east along Old Shoreham Road*' particularly telling in this connection. The first shows a prominent corner block at the top of the building which appears to me isolated and not well integrated with the remainder of the top storey in the way that the lower but less isolated version at the east end would be. Although I welcome the introduction of a corner feature, I do not consider this upper part well formed, tending to draw the eye upward and negating the effect of the corner at ground level and just above, where it is needed to enclose space. The second view shows expanses of flank elevation of the higher elements where the attractive and ordered stepping of the lower levels is reduced to an unattractive mixture of shapes and finishes. This would again draw the eye and erode the enclosing value of the south elevation along the main road.
15. There are identified long views across the park from near Park View Road (photo page 6) and along the Old Shoreham Road (photo page 7) from near the Sackville Road crossing. There was much evidence over the relationship with the heights of adjoining buildings, the existing flats especially. In these views the eye line would be somewhat elevated compared with the closer photomontage views and the effect of the height of the building, as expressed by the undulating top storey, would be less apparent, often filtered by nearer trees or subsumed within the background. Within either the expanse of the park or the clutter and activity of Old Shoreham Road, I do not identify that real harm would be caused to these views, notwithstanding my opinion over the nearer views expressed above.
16. In conclusion with regard to Scheme 1, I find attractive and appropriate placement and elevational treatment up to the parapet level but that attractiveness would be undone by an over-prominent and over-assertive top storey, tending to draw the eye and introduce too many shapes and surface finishes at odds with the treatment of the floors below. The resulting building as a whole would, in my judgement, cause harm to the character and appearance of the area in short to medium views, contrary to the requirements in Local Plan Policy QD1 regarding scale and height, together with architectural detailing, and Policy QD2 on the impact on the skyline, which, with regard to the specific requirements of Policy QD4, I do not consider as being restricted to long views and which would be evident due to the limited backdrop of trees in close views.

17. **Scheme 2, Appeal B.** This was promoted to answer the Council's reasons for refusal of the earlier scheme and contains both similarities and differences. In plan form there would be a similar disposition of built form along the Goldstone Crescent and Old Shoreham Road frontages, and which I have found appropriate. There would be an additional section of building extending to the north alongside Hove Park Road, bridging over the vehicular access. This additional structure allows the total accommodation to remain at 72 flats while allowing a reduction in height elsewhere. I do not object to the addition, it would complete the 'u' shape and would not be so close to Gannet House as to cause harm within the sylvan setting close to Hove Recreation Ground.
18. The reduction in height is achieved by taking away one of the storeys between the 'plinth' and the roof storey at the east of the site and round to near Gannet House, and by reducing that top storey in actual height. I consider that the reduction in overall height at this end reduces the beneficial effect of the feature to replace Park House in westward views and diminishes the presence of the corner in the wider street scene. The change to the roof storey would result in a weaker, more horizontal line which, whilst more restrained and whilst having lost the mixture of shapes and finishes that I find so disruptive in the first scheme, has replaced it with a feature that I find over-recessive, lacking in interest and bland, and for those reasons, also at odds with the quality of the treatment below.
19. The corner of Goldstone Crescent and Old Shoreham Road would change from a striking vertical line of glazing and panels that turns the corner, to an indented, more horizontal set of balconies which I consider less successful in forming that important feature in views along Fonthill Road and Old Shoreham Road. These balconies would be used for sitting, with furniture and the like, and I acknowledge the control that the appellant feels able to exercise over that use and any paraphernalia. In the main blocks in Scheme 1 any items would be mostly against a background of the building, but in this later scheme they would be prominent and possibly seen in silhouette, causing a distraction to the view in my judgement.
20. One other change, and to my mind a most unfortunate loss, would be the reduction in the stepping form along the main road, there being only the single step at the slight change in direction. That results in the upper block, nearest Hove Recreation Ground, appearing more dominant despite its reduced height to the east, and reduces the degree to which the elevation responds to the smaller scale of blocks to the south of the road and the topography of the area.
21. My opinion regarding long views is little changed with this scheme, the reduction in the upper extent of the building on the west facing facade and around the corner together with the alteration to the top storey treatment would not cause any greatly different effect to that which was acceptable before.
22. In conclusion with regard to Scheme 2, I find that in the process of changing the top storey and the overall height of parts of the scheme, other changes have been introduced that I consider cause visual harm to the character and appearance of the area, and that as a result the revised scheme fails to accord with the aims of the same Local Plan policies which seek to ensure the quality of new development and to control its effect on the area.



*Play Space*

23. The first scheme provided an area designated for occasional play that was also the last five spaces at the closed end of the car park. The appellant put forward a plan showing how this area could be treated to reinforce the dual role and aid safety. That dual role appears in the Council's Sustainability Checklist, a required document in this planning application, implying to me that this is regarded as a desirable feature to make best use of land and not sterilise areas of car parking when it is not in use. Be that as it may, I can see conflict if this theory is not put into practice carefully.
24. I acknowledge that there may be developments where it can be all but guaranteed that the last few car park spaces would be little used, or a management regime could ensure that. The proposal here is allocated spaces, but that may not be readily linked to those occupiers who take their vehicles away for long periods during the day, and that situation would be changing as people move dwelling or job, or their lifestyle changes for some other reason. However desirable as a theory, I consider the space of little value to either car park users or children if cars were in the way and at risk of damage. Added to this is the need for care in manoeuvring. The checklist seeks 'to provide flexible space which can accommodate other uses outside the areas of peak parking demand' and asks 'what percentage of car parks will be designated to be flexible use (for example play space....when not being used for parking)'. I am not persuaded in this scheme that, as proposed, the car parking would be 'not used' sufficiently to be suited to this dual role over such a small area.
25. The second scheme overcomes this by designating a separate and distinct area, as a Local Area for Play, and at no loss of car parking space or other adverse effect on what is essentially the same plan layout in this part of the site. It is the case therefore that this layout can be substituted for that in the first scheme by condition without other undue effects, overcoming any objection that might be derived from the aims of Local Plan Policy TR7 of not increasing the danger to users of adjacent pavements, cycle routes and roads.
26. I turn now to consider the role that Hove Recreation Ground and Hove Park can take in the provision of play space to future occupiers of this development. The first is not equipped but is the more accessible without need to cross a busy road, and does provide large areas of grass and open air. The second is well equipped and extensive, providing for a range of leisure and play uses. The access is across Goldstone Crescent but there is a light controlled crossing at the junction near the site. I consider both well placed to provide for the needs of a range of occupiers of the appeal building, not just children's play. Whilst there was evidence of a high level of use, and there is an apparent under-provision of open space and play space in the city as a whole, I have been directed to no definitive evidence that the two areas in question operate at such a high level of use as to preclude use by the future occupiers.
27. Local Plan Policy HO6 states that new residential development will not be permitted unless the requirement for outdoor recreation space, generated by the development, is suitably provided, and goes on to say that where it is not practicable or appropriate for all or part of the outdoor recreation space requirements to be provided on site, contributions to their provision on a suitable alternative site, may be acceptable. The Council has published draft

guidance in SPG9 "A Guide for Residential Developers on the Provision of Outdoor Recreation Space". I find it not only possible to provide an area for play on-site, but desirable. It would allow access to an area for play and for parents or guardians to meet for short periods close to home at times when a trip out to the nearby parks might not be possible or convenient. Policy HO6 therefore can be satisfied in providing part of the requirement on-site, and should be by condition in scheme 1.

28. The appellant has put forward an Agreement pursuant to Section 106 of the 1990 Act which offers a contribution to off-site provision. That is provided for in Policy HO6 and it is my view on the evidence that within the large expanse of Hove Park in particular, but not discounting possible use in the recreation ground, improvements could be made to provide additional capacity and improve quality. I attach full weight to this provision in furthering the aims of the policy and draft Supplementary Planning Guidance in ensuring facilities are available for the new occupiers of the development without adversely affecting the existing users of the facilities. In conclusion on this main issue I consider the on-site provision in Scheme 2 necessary and desirable and that this should be placed also in Scheme 1 to replace a dual use that I find to be not fully resolved and hence unacceptable, and that the aims of the Local Plan policies and draft guidance can be satisfied by way of contribution to off-site provision in addition.

#### *Amenity Space*

29. This relates to four flats in the first scheme, Units 49, 62, 68 and 72, which are wheelchair accessible dwellings. Unlike other flats in the scheme, the balconies to these flats are accessible only off a bedroom. I acknowledge that all balconies in the scheme are generous and hence readily usable as an extension of the living space of the flat, and it is for that reason that I consider it appropriate for the balconies to these flats to be accessible from the living room. The provision of a Juliet balcony to these living rooms would be a benefit, but would not be of the same value. I do not discount the possibility of full occupation of these two bedroom flats in which case access through a bedroom only would be a distinct disadvantage to family members.
30. The revised layout presented by the appellant at the Inquiry satisfactorily overcomes this failing without outward effect, and in addition provides natural light to the kitchen area, admittedly at the expense of the bathroom. Unlike representation from a third party, I do not regard a 'land-locked' bathroom as a serious problem and, in a flat development, outside wall and natural light should be reserved for rooms requiring it. I see no reason why, were all other matters acceptable, this revised layout should not be substituted by way of condition, ensuring compliance with the aims of Local Plan Policy QD27 in providing an acceptable standard of amenity to future users and Policy HO5 as it has been shown that private useable amenity space can be provided which is appropriate to the scale and character of the development.

#### *Sustainability*

31. This was a reason for refusal in the first scheme and appears to have been overcome in the second scheme by reason of the proposed attainment of Level 4 of the Code for Sustainable Homes. The Statement of Common Ground
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agrees Level 4 for the first scheme also, albeit that this is additional to the Level 3 that formed part of the application. A condition was put forward by the Council to secure this provision and on that basis no evidence was submitted with regard to the fifth reason for refusal in Appeal A. The appellant stated during the Conditions session at the Inquiry that this reference in the Statement of Common Ground was an error, that the first scheme was intended to be Level 3 as applied for and that the higher level is not required by policy.

32. I did not have the information that I would need to determine this matter and I made clear that this would require formal evidence open to cross-examination. The appellant decided then that they were able to aspire to Level 4 and a form of words for a condition was agreed that provided for this. I am satisfied that a framework could be in place to ensure compliance with Local Plan Policy SU2 that development demonstrates a high standard of efficiency in the use of energy, water and materials, and note that the supporting text refers to the BREEAM analysis which has, for residential buildings, been superseded by the Code for Sustainable Homes.

### **Other Considerations**

33. I have heard no compelling evidence that the proposal to develop 72 flats as such, or to accommodate the numbers of people indicated by that number of flats of the size proposed, would be harmful. I noted, along with both parties that were at the site inspection, that posters displayed in the windows of houses opposite expressed an objection to 72 flats, although again I acknowledge that the evidence of their representative, and the written representation to both the Council at the time of the original applications and to the Planning Inspectorate extended beyond just numbers. My objections in each case are to the effect of part of the built form proposed to accommodate the 72 flats and not to that number. The differences between Scheme 1 and Scheme 2 indicate well the ability to alter that built form.
34. One possible manifestation of numbers that has been objected to by residents and the local Councillor is the effect of parking. The development would provide only a part of the possible demand for parking space, in line with policies aimed at reducing dependence on the private car and making best use of land. Spaces that are provided would be allocated and some flats would be let without the benefit of on-site parking. A car club would be formed with space secured by the Agreement. The appellant has amended the detail of the parking appraisal of surrounding roads in response to later representation but the conclusions are stated as remaining the same. I noted the restrictions in nearby roads designed to discourage commuter parking, by a ban during one hour at mid-morning, and also to ensure a turnover of spaces for users of the park by various time limits. Peak demand from the proposed development would tend to be at the non-commuter times. I concur with the views of the Council and the appellant that, in line with Central Government and local policy, the proposed level of parking provision should not be a reason to refuse permission in these cases.
35. There was information on the housing land supply in the city. From the latest figures it appears that the Council are not able to demonstrate a five year supply of specific deliverable sites to meet the requirements of the South East



Plan and as set out in PPS3. The requirement of the South East Plan is anticipated to be met by adding in an allowance for small unidentified (windfall) sites, and large windfall sites could boost this supply further. Paragraph 59 of the Central Government guidance states that allowances for windfalls should not be included in the first 10 years of land supply unless the Council can provide robust evidence of genuine local circumstances that prevent specific sites being identified. Then the historic windfall delivery rates may be considered, as has been the case in the Council's *"Housing Delivery Technical Background Paper"*. The advice produced by The Department for Communities and Local Government *"Demonstrating a 5 Year Supply of Deliverable Sites"* sets out the requirements for taking account of unallocated sites. I am not persuaded that the reasons put forward by the Council amount to the genuine local circumstances, being a reference to a constrained urban area, although this matter should receive a fuller consideration by relevant parties during the plan-making process. On the information before me and a need to rely on windfall sites I consider it right to consider favourably an application for planning permission for housing, but having regard to policies in PPS3, the Development Plan and other material considerations. Of those matters specifically referred to in paragraph 69 of PPS3 I find the mix acceptable, the site suitable and the development of 72 dwellings appropriate in itself and thus making good use of land, better than the 60 dwellings assumed in the updated *"Strategic Housing Land Availability Assessment"*. However, as previously stated paragraph 16 sets out the need for housing to be of a high quality, well designed and which is well integrated with, and complements the neighbouring buildings and the local area, and it is my findings in the first main issue that neither scheme satisfies this requirement. I shall carry out the planning balance in my concluding paragraph.

## **Conclusions**

36. The site is in a sustainable location, is suitable for development at the density proposed, and flats are a part of the character and appearance of the area. The plan form and main building heights are acceptable in this location, as are the architectural treatment and use of materials of the ground floor and in general, the main floors of accommodation. The matters of play space, amenity space and sustainability can be dealt with by condition and the Agreement. However, Scheme 1 utilises an incongruous top storey building form which would cause visual harm in middle and near views and would not relate well to the surrounding townscape. Scheme 2, whilst addressing certain aspects of the earlier design, introduces new but also incongruent features while removing some attractive aspects of Scheme 1. The result is that neither scheme is of the standard that this prominent site deserves. The provision of affordable housing would be welcome and the development would assist in the making-up of a shortfall in the supply of housing land but these considerations do not outweigh the harm that these particular proposals would cause. The development would not accord with the requirements of the Development Plan nor Central Government planning policy that housing be of a high standard of design. For the reasons given above I conclude that both appeals should be dismissed.

*S J Papworth*  
INSPECTOR

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## APPEARANCES

### FOR THE LOCAL PLANNING AUTHORITY:

R Williams he called	of Counsel
G Bennett BA MA DipTP IHBC	Senior Planner (Conservation) Design and Conservation Team, Environment Department, Brighton & Hove City Council
C Wright BA(Hons) MA MRTPI	Planning Officer Development Control Team, Environment Department, Brighton & Hove City Council

### FOR THE APPELLANT:

H Townsend she called	of Counsel
L Carter BA(Hons) DipTP MRTPI	Director Lewis and Co Planning South East Limited
A Parsons DipArch RIBA	Pollard Thomas Edwards Architects
A French BEng(Hons)	Project Manager The Civil Engineering Practice

### INTERESTED PERSONS

Dr Duncan Barker Cllr J Bennett Valerie Paynter	On behalf of residents Ward Councillor Save Hove
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### DOCUMENTS

Document	A/1	Tree Preservation Order submitted by appellant
Document	A/2	Addition to Urban Character Study submitted by appellant
Document	A/3	Photographs used for photomontages submitted by appellant
Document	A/4	City Park elevations submitted by appellant
Document	A/5	Photograph of existing building in front of trees submitted by appellant
Document	A/6	Advice Produced by DCLG " <i>Demonstrating a 5 Year Supply of Deliverable Sites</i> " submitted by appellant
Document	A/7	" <i>Strategic Housing Land Availability Assessment</i> " update submitted by appellant
Document	A/8	" <i>Urban Design Issues and Comment</i> " G Thompson 3 September 2009 submitted by appellant
Document	A/9	Revised flat plan Units 49, 62, 68 and 72 submitted by appellant

Document	A/10	Appeal Decision APP/Q1445/A/09/2111237 Plots 1 and 2, Land off Braypool Lane, Brighton submitted by appellant
Document	A/11	Agreements dated 2 March 2010 submitted by appellant
Document	A/12	Appeal Decision APP/Q1445/A/08/2081266 Land east of 55 Highcroft Villas, Brighton submitted by appellant
Document	A/13	Drawing list for both appeals submitted by appellant
Document	A/14	e-mail from A French in response to Cllr J Bennett e-mail (DOC I/3) submitted by appellant
Document	A/15	Costs Application submitted by appellant
Document	C/1	Full copy SHLAA submitted by Council
Document	C/2	Housing Delivery Technical Background Paper submitted by Council
Document	C/3	Building Heights, elevations, original and subsequently amended tables agreed by appellant submitted by Council
Document	C/4	Suggested conditions submitted by Council
Document	C/5	Suggested itinerary for site inspection submitted by Council
Document	C/6	Costs rebuttal submitted by Council
Document	C/7	Letter Council to appellant 27 October 2009 regarding right to speak at Committee submitted by Council
Document	C/8	e-mail Council to appellant 17 September 2009 submitted by Council
Document	I/1	Speaking notes and background information submitted by Save Hove
Document	I/2	Photographs and sketches submitted by Dr Barker on behalf of residents
Document	I/3	e-mail 4 March 2010 Cllr J Bennett to Planning Inspector regarding traffic and parking, referred to appellant (see DOC A/14)

