

<b><u>No:</u></b>	<b>BH2018/02786</b>	<b><u>Ward:</u></b>	<b>Central Hove Ward</b>
<b><u>App Type:</u></b>	<b>Full Planning</b>		
<b><u>Address:</u></b>	<b>Hove Manor Hove Street Hove BN3 2DF</b>		
<b><u>Proposal:</u></b>	<b>Erection of a single storey extension at roof level to create 2no three bedroom dwellings &amp; 1no two bedroom dwelling (C3) with external terraces.</b>		
<b><u>Officer:</u></b>	Laura Hamlyn, tel: 292205	<b><u>Valid Date:</u></b>	17.10.2018
<b><u>Con Area:</u></b>		<b><u>Expiry Date:</u></b>	12.12.2018
<b><u>Listed Building Grade:</u></b>		<b><u>EOT:</u></b>	
<b><u>Agent:</u></b>	Mr Abe Mohsin 7 Hove Manor Parade Hove Street Hove BN3 2DF		
<b><u>Applicant:</u></b>	Mr Benjamin Cowen New Burlington House 1075 Finchley Road London NW11 0PU		

## 1. RECOMMENDATION

- 1.1. That the Committee has taken into consideration and agrees with the reasons for the recommendation set out below and resolves to **GRANT** planning permission subject to the following Conditions and Informatives:

### Conditions:

1. 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.

<b>Plan Type</b>	<b>Reference</b>	<b>Version</b>	<b>Date Received</b>
Location and block plan	0222-P-001		5 September 2018
Proposed Drawing	0222-P-002	A	26 November 2018
Proposed Drawing	0222-P-003		5 September 2018
Proposed Drawing	0222-P-004		5 September 2018
Proposed Drawing	0222-P-005		5 September 2018

2. 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.

3. The development hereby permitted shall not be commenced until samples of all materials to be used in the construction of the external surfaces of the development have been submitted to and approved in writing by the Local Planning Authority, including (where applicable):

- a) samples of all cladding to be used on the walls, soffit and eaves, including details of their treatment to protect against weathering, and expected weathering patterns
- b) details of the proposed window, door and balcony treatments
- c) details of all other materials to be used externally

Development shall be carried out in accordance with the approved details.

Reason: To ensure a satisfactory appearance to the development and to comply with policies HE6 of the Brighton & Hove Local Plan and CP15 of the Brighton & Hove City Plan Part One.

4. Access to the roof of the existing block shall be limited to those areas marked as terrace on the approved drawings. Those areas marked as 'maintenance access only' shall be for maintenance or emergency purposes only and the flat roof 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.
5. Within 6 months of commencement of the development hereby permitted or prior to occupation, whichever is the sooner, a scheme shall be submitted to and approved in writing by the Local Planning Authority to provide that the residents of the new development, other than those residents with disabilities who are Blue Badge Holders, have no entitlement to resident's on-street parking permits.  
Reason: This condition is imposed in order to allow the Traffic Regulation Order to be amended in a timely manner prior to first occupation to ensure that the development does not result in overspill parking and to comply with policies TR7 & QD27 of the Brighton & Hove Local Plan and CP9 of the City Plan Part One.
6. The development hereby permitted shall not be occupied until a car park management plan has been submitted to and approved in writing by the Local Planning Authority, detailing that the residents of the new development, other than those residents with disabilities who are Blue Badge Holders, have no entitlement to on-site resident's parking permits. The car park management plan shall thereafter be fully implemented in accordance with the approved details.  
Reason: To ensure that the development does not result in overspill parking and to comply with policies TR7 & QD27 of the Brighton & Hove Local Plan and CP9 of the City Plan Part One.
7. The development hereby permitted shall not be occupied until details of secure cycle parking facilities for the occupants of, and visitors to, the development have been submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be fully implemented and made available for use prior to the first occupation of the development and shall thereafter be retained for use 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 and SPD14: Parking Standards.
8. Prior to first occupation of the development hereby permitted, dropped kerbs and tactile paving shall have been installed to the northern and southern footways of Hove Street at the junction with Vallance Road.

Reason: To ensure that suitable footway provision is provided to and from the development (amend as necessary) and to comply with policies TR7 and TR8 of the Brighton & Hove Local Plan and SA6, CP7, CP9, CP12, CP13 and CP15 of the City Plan Part One.

9. None of the residential units hereby approved shall be occupied until each residential unit built has achieved an energy efficiency standard of a minimum of 19% CO2 improvement over Building Regulations requirements Part L 2013 (TER Baseline).

Reason: To ensure that the development is sustainable and makes efficient use of energy to comply with policy CP8 of the Brighton & Hove City Plan Part One.

10. None of the residential units hereby approved shall be occupied until each residential unit built has achieved as a minimum, a water efficiency standard of not more than 110 litres per person per day maximum indoor water consumption.

Reason: To ensure that the development is sustainable and makes efficient use of water to comply with policy CP8 of the Brighton & Hove City Plan Part One.

Informatives:

1. In accordance with the National Planning Policy Framework and Policy SS1 of the Brighton & Hove City Plan Part One 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. The planning permission granted includes an obligation upon the applicant to carry out small scale footway improvements on the adopted (public) highway that is owned by the Highway Authority (in this case Brighton & Hove City Council). Previously the applicant would have been conditioned to enter into a bespoke legal agreement and pay a contribution towards these works being carried out for the benefit of the development but to amongst other reasons reduce the costs of these works for all parties concerned the council is now obligating the applicant to carry out these works. The applicant or their representative is advised to contact the Council's Streetworks team (permit.admin@brighton-hove.gov.uk 01273 290729) who will provide information and if approved, a licence (instead of a bespoke legal agreement) for what, when & where work can be done, who will be permitted to carry out the works, possible contractor contact details to place orders with, design advice, material advice and will check that the footway improvements are built satisfactorily. The emphasis where possible is on minimising what needs to be done to build a satisfactory footway improvement for the benefit of the applicant, future occupants and visitors of the site and the community as a whole, and in particular the mobility and visually impaired of those respective groups. Finally be advised that the applicant or their representative must obtain all necessary highway approval from the Highway Authority prior to any works commencing on the adopted (public) highway to satisfy the law and requirements of this condition.

3. The applicant is advised that the scheme required to be submitted by Condition 5 should include the registered address of the completed development; an invitation to the Council as Highway Authority (copied to the Council's Parking Team) to amend the Traffic Regulation Order; and details of arrangements to notify potential purchasers, purchasers and occupiers of the restrictions upon the issuing of resident on-street parking permits
4. The applicant is advised that accredited energy assessors are those licensed under accreditation schemes approved by the Secretary of State (see Gov.uk website); two bodies currently operate in England: National Energy Services Ltd; and Northgate Public Services. The production of this information is a requirement under Part L1A 2013, paragraph 2.13.
5. The water efficiency standard required is the 'optional requirement' detailed in Building Regulations Part G Approved Document (AD) Building Regulations (2015), at Appendix A paragraph A1. The applicant is advised this standard can be achieved through either: (a) using the 'fittings approach' where water fittings are installed as per the table at 2.2, page 7, with a maximum specification of 4/2.6 litre dual flush WC; 8L/min shower, 17L bath, 5L/min basin taps, 6L/min sink taps, 1.25L/plate setting dishwasher, 8.17 L/kg washing machine; or (b) using the water efficiency calculation methodology detailed in the AD Part G Appendix A.

## **2. SITE LOCATION & APPLICATION DESCRIPTION**

- 2.1. Hove Manor is a large, early 20th century, purpose built block of flats with ground floor commercial uses, on the east side of Hove Street. It is in the Old Hove Conservation Area and overlooks the Pembroke and Princes Conservation Area, both of which predominantly comprise late 19th century 2 storey housing, although other mid-rise blocks are peppered within these areas along with surviving earlier origins of this part of Hove.
- 2.2. The properties to the immediate north, Regent House and Audley House, are included on the Council's list of Local Heritage Assets, as is the flint wall forming the southern boundary to this site (remnants of the garden wall to the former Hove Manor that occupied this site), and the more distant No3, Hove Street. Slightly further away are Barford Court at 157 Kingsway and Hove Library on Church Road which are listed Grade II.
- 2.3. Due to its height and footprint this property is already a dominant element of the streetscene and can be seen in views from neighbouring streets, however the use of red brick provides an element of association with its setting.
- 2.4. The application seeks permission to erect an additional storey to create 2no three bedroom flats and 1no two bedroom flat (C3) with external terraces.

## **3. RELEVANT HISTORY**

3.1. **PRE2018/00148-** Erection of additional storey to create 5no additional flats (C3).

3.2. **BH2001/00987/FP-** Demolition of 3 redundant plant rooms on roof and proposed cladding of existing lift rooms with boarding to match existing brick structure. Approved 19/07/2001.

#### **4. REPRESENTATIONS**

4.1. **Sixty two (62)** representations have been received objecting to the proposed development for the following reasons:

- Inappropriate height of development, maximum height in Hove Manor is 6 storeys,
- Overshadowing, loss of light/sunlight,
- Loss/restriction of view,
- Loss of privacy, overlooking,
- Visual impact of development, effect of the development in the character of the neighbourhood, adverse impact on Conservation Area, harmful to significance of a locally listed building,
- Unacceptable high density in area especially with plans for King Alfred,
- Overdevelopment, overbearing development,
- Poor design, proposed modern extension/materials/fenestration will be out of character with the art deco era of existing building and character of local area.
- Proposed materials have a limited life span of only 25 years,
- Additional noise to local residents at a height, especially from proposed terraces and additional lift,
- Disruption and noise during construction as well as increased traffic problems from construction deliveries and impact on water supply,
- Will do nothing to ease housing problems in the city and will not be affordable for most people, flats will be unsuitable for younger families,
- New lift is out of keeping with the two other lifts and will only hold 3 people which is not enough for increased intensity of usage by proposal. Installation of a new lift will leave elderly/infirm residents housebound for the duration of the work on the lift shaft, which is unacceptable,
- Additional traffic, increased safety concerns if more vehicles exiting site.
- Inaccurate planning statement regarding parking, proposal will exacerbate existing parking problems on site and in area for residents, tradespeople, emergency access, deliveries etc. Increased danger for pedestrians from further illegal parking on pavement in front of shops,
- Detrimental effect on property values,
- Will set a precedent for other blocks to add additional storeys, silhouette of Viceroy Lodge on Hove Street has been scarred by an additional floor that is not in keeping with the period property,
- Additional disturbance to existing residents from increased use of communal areas,

- Use of fire escape for access is not acceptable,
  - Inaccurate documents submitted regarding impact on visual an neighbouring amenity,
  - More refuse and waste for existing overstretched recycling/refuse amenities,
  - Increased fire safety concerns. Use of cladding is not appropriate nor safe,
  - Leaseholder not made aware of proposal when purchasing property in 2017,
- 4.2. **Three (3)** representations have been received supporting the proposed development for the following reasons:
- Good design, done in a professional manner such developments are not obtrusive and add to the much needed accommodation in the area
  - Complies with government's brownfield land policy,
  - There is a big shortage of residential units in the city which will only be overcome by building on vacant land such as this roof which currently serves no useful purpose,
  - Seems reasonable use of the space to create new homes
- 4.3. **One (1) letter** has been received commenting on the proposed development:
- application is quite adequate in its proposal and would help in providing additional housing problems that the city currently lacks
- 4.4. **Councillor Andrew Wealls** objects to the proposed development. A copy of the objection is attached to this report.

## 5. CONSULTATIONS

- 5.1. **Brighton & Hove Archaeological Society:** Comment The proposed application is close to the finds spots of material from both the Late Bronze Age and Neolithic periods. It is possible that vestiges of ancient landscapes may remain. Suggest the County Archaeologist is contacted for recommendations.
- 5.2. **Heritage:** No objection The submitted scheme has gone some way to resolving the issues identified in pre-application advice. The setting back of the proposed additional storey from the front and rear elevations is considered a significant improvement, and the reduction in the bulk of the roof profile has achieved a far more elegant profile which would also have less impact on the roofscape, and these changes are welcomed.
- 5.3. The revised alignment of the windows has a stronger relationship with the host building, although it is considered that this could be developed further for the benefit of the scheme.

- 5.4. Without material samples it is not considered that the proposed cladding can be properly assessed for its potential to fit with the existing brick facades and further information will also be required on the weathered appearance of this material over time in this coastal environment, however this can be adequately dealt with by conditions if further information is not provided at this stage.
- 5.5. *Verbal update:* The overall height of the proposed development was considered in the heritage impact of the scheme.
- 5.6. **Conservation Advisory Group:** No objection.  
The Group had no objection on grounds of conservation, but added that perhaps the centre bay extension at roof level could be set back further to give better visual balance to the whole centre bay as seen from ground level.
- 5.7. **Transport:** No objection subject to inclusion of the necessary conditions, including the restriction of residents' access to parking permits, implementation of cycle parking, the installation of footway improvements.
- 5.8. **Private Sector Housing:** No Comment.

## 6. MATERIAL CONSIDERATIONS

- 6.1. In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan, and all other material planning considerations identified in the "Considerations and Assessment" section of the report
- 6.2. The development plan is:
  - Brighton & Hove City Plan Part One (adopted March 2016)
  - Brighton & Hove Local Plan 2005 (retained policies March 2016);
  - East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (adopted February 2013);
  - East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (adopted February 2017)
- 6.3. Due weight has been given to the relevant retained policies in the Brighton & Hove Local Plan 2005 according to their degree of consistency with the NPPF.

## 7. POLICIES

- 7.1. The National Planning Policy Framework (NPPF)
- 7.2. Brighton & Hove City Plan Part One  
SS1           Presumption in Favour of Sustainable Development  
CP1           Housing delivery

CP7	Infrastructure and developer contributions
CP8	Sustainable buildings
CP9	Sustainable transport
CP12	Urban design
CP14	Housing density
CP15	Heritage
CP19	Housing mix

7.3. Brighton & Hove Local Plan (retained policies March 2016):

TR7	Safe Development
TR14	Cycle access and parking
SU10	Noise Nuisance
QD5	Design - street frontages
QD14	Extensions and alterations
QD27	Protection of amenity
HO5	Provision of private amenity space in residential development
HO13	Accessible housing and lifetime homes
SR7	Local parades
HE3	Development affecting the setting of a listed building
HE6	Development within or affecting the setting of conservation areas
HE10	Buildings of local interest

7.4. Supplementary Planning Documents:

SPD09	Architectural Features
SPD12	Design Guide for Extensions and Alterations
SPD14	Parking Standards

7.5. Supplementary Planning Guidance:

SPG15	Tall Buildings
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## 8. CONSIDERATIONS & ASSESSMENT

8.1. The main considerations in the determination of this application relate to the principle of the proposed additional residential units, the impact on the character and appearance of the proposal on the building and the Old Hove Conservation Area and the setting of the Pembroke and Princes Conservation Area, the impact on neighbouring amenity, the standard of accommodation to be provided, sustainability and transport issues.

8.2. An amended floorplan was received during the course of the application reducing the width of the terraces to reduce overlooking of the existing balconies and side facing windows to the storeys below. Additional drawings with site sections and a Daylight & Sunlight Assessment were also received during the course of the application.

### 8.3. Principle of Development:

The City Plan Part 1 Inspector's Report was received in February 2016. The Inspector's conclusions on housing were to agree the target of 13,200 new homes for the city until 2030 as a minimum requirement. It is against this



minimum housing requirement that the City's five year housing land supply position is assessed annually.

- 8.4. The Council's most recent housing land supply position is published in the SHLAA Update 2018 (February 2019). The figures presented in the SHLAA reflect the results of the Government's 2018 Housing Delivery Test which was published in February 2019. The Housing Delivery Test shows that housing delivery in Brighton & Hove over the past three years (2015-2018) has totalled only 77% of the City Plan annualised housing target. Since housing delivery has been below 85%, the NPPF requires that a 20% buffer is applied to the five year housing supply figures. This results in a five year housing shortfall of 576 net dwellings (4.5 years supply). In this situation, when considering the planning balance in the determination of planning applications, increased weight should be given to housing delivery in line with the presumption in favour of sustainable development set out in the NPPF (paragraph 11).
- 8.5. The proposed additional storey would allow the creation of three additional units of residential accommodation, which would make more efficient use of the site. The principle of the development can be accepted, subject to other material planning considerations set out below.
- 8.6. Design and Appearance:**  
Pre-application advice was sought prior to the submission of this application, and the advice was broadly supportive of the principle of the development with recommendations on how to improve the scheme. This proposal has been amended taking the feedback into account. The additional storey is set back further from the front and rear elevations of the main block, and the roof profile has been reduced to achieve a more elegant profile.
- 8.7. SPG15 Tall Buildings sets out that tall buildings are defined as buildings of 18m or taller, and that applications relating to tall buildings should be accompanied by a Tall Building Study. This application does not specifically include a Tall Building Study. The submission does include a detailed Design and Access Statement with visual studies of the development from various vantage points in the vicinity of the site, as well as a Heritage Statement, which address some of the key points in a Tall Building Study.
- 8.8. Tall buildings as defined in SPG15 fall into various categories: 'mid-rise' or 6-8 storeys, 'tall' or 9-14 storeys, and 'very tall' or 15+ storeys. New tall buildings of over 6 storeys (18m+) should not generally be within conservation areas. However it is noted that the existing block is already classed as a tall building, and with the proposed extension the resulting building would still be categorised as 'mid-rise'. It is considered that the resulting building relates appropriately to the urban grain and its context. There are a number of buildings of a similar height in close proximity to the site, including Prince's Court opposite, Viceroy Lodge at the junction with Kingway to the south, and Dolphin Court near the junction with Church Road to the north.

- 8.9. The proposed additional storey would be set back from all of the elevations, with a large set back from the front elevation to allow for outdoor amenity space. It is considered that the proposed bulk and massing would not harm the character and appearance of the building or wider conservation area.
- 8.10. It is regrettable that the windows to the proposed additional storey have not been reconsidered to better align with the fenestration below, however it is acknowledged that the proposed additional storey would not be read on the same plane as the rest of the façade from most public views, and as such it is considered the resulting appearance of the building would not be harmed.
- 8.11. The agent confirmed by email dated 27 Feb 2019 that the proposed zinc cladding may not be appropriate, and that other material options would be investigated, including fibre cement panels or powder coated aluminium panels. A similar colour as shown in the submitted documents would be specified. Provided the colour is similar, it would tone with the brickwork of the existing block, and is likely to be acceptable. It is recommended that a sample and details of expected weathering be required by condition.
- 8.12. It is considered that the proposed additional storey would not result in harm to the character and appearance of the building overall or the wider conservation area.
- 8.13. 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.
- 8.14. Amended drawings were received during the course of the application reducing the width of the proposed terraces facing Hove Street, in order to minimise overlooking of the balconies and side facing windows to the flats below. The spaces to the side and rear are annotated as being for maintenance access only. It is recommended that this be secured by condition. Given the presence of balconies to the existing flats at Hove Manor, the inclusion of outdoor amenity space for the proposed development is accepted. It is considered that the proposed terraces would not result in harmful overlooking or excessive noise disturbance to the detriment of neighbouring amenity.
- 8.15. The views from the proposed windows would be of a similar nature to the views from the existing fifth floor windows, and would not result in harmful overlooking.
- 8.16. The proposed additional storey would introduce greater bulk and massing at roof level. However this would be set away from the existing parapet. The existing block overshadows some of the neighbouring windows, especially at ground floor level. At first floor level at Vallance(or higher at Princes Court

opposite), the proposed additional storey would result in a small loss of light to neighbouring windows.

8.17. A Daylight & Sunlight Assessment was provided during the course of the application to demonstrate that the proposed additional storey would not result in harmful overshadowing. This report focused on 22 Vallance Gardens as it has the closest relationship with the rear of Hove Manor, and concluded that the proposal would have no effect of the daylight and sunlight levels. On this basis the report also concluded that other windows to Vallance Gardens would not be impacted.

8.18. Given the set back of the proposed development from the parapet of the existing block, it is considered that the proposed additional storey would not result in significant harm of a degree sufficient to warrant refusal of the application.

**8.19. Standard of Accommodation:**

The 'Nationally Described Space Standards' (NDSS) were introduced by the Department for Communities and Local Government in 2015 to establish acceptable minimum floor space for new build developments. Although these space standards have not been formally adopted into the Brighton and Hove City Plan, Draft City Plan Part 2 proposes to adopt them and indicates a direction of travel on behalf of the LPA. The NDSS provide a useful guideline on acceptable room sizes that would offer occupants useable floor space once the usual furniture has been installed. The NDSS identifies a minimum floor space that should be achieved for a single bedroom as measuring at least 7.5sqm, and a double bedroom should measure at least 11.5sqm. The minimum floor space requires a head height of above 1.5m.

8.20. The following standards are relevant:

2b 3p dwelling - 61 sqm  
2b 4p dwelling - 70 sqm  
3b 5p dwelling - 86 sqm  
3b 6p dwelling - 95 sqm

8.21. Flat 1:

Total: 138 sqm  
bedroom 1: 11.9 sqm  
bedroom 2: 10.3 sqm  
bedroom 3: 11.6 sqm

8.22. Flat 2:

Total: 80 sqm  
bedroom 1: 13.6 sqm  
bedroom 2: 10.1 sqm

8.23. Flat 3:

Total: 186 sqm  
bedroom 1: 20.8 sqm  
bedroom 2: 16.1 sqm

bedroom 3: 11.3 sqm

- 8.24. The proposed units exceed the government standards for gross internal floor area. Some of the bedrooms are shown with double beds rather than single beds despite being too small to provide two bedspaces. Given that these standards are used for reference only, this is not of significant concern to a degree to warrant refusal of the application. The inclusion of a long hallway to access the main living space from the communal areas is not an ideal layout, however all of the habitable rooms benefit from adequate circulation space, natural light and ventilation. All three flats benefit from outdoor amenity space. The proposed standard of accommodation is considered acceptable.

## **9. Sustainable Transport:**

- 9.1. No changes are proposed to the existing pedestrian and vehicular access, this is considered acceptable. It is expected that the proposed development would lead to an increase in trips to the site. In order to ensure that the development provides for this, it is recommended that improvements to pedestrian routes in the vicinity of the site be secured by condition.

- 9.2. One of the neighbour representations indicates that the existing on-site parking is controlled by the managing agents who issue Residents' Parking Permits on an unallocated basis to current leaseholders. This was confirmed by the agent during the course of the application, with a photo showing the terms and conditions of parking on the site. To achieve the aim of controlling parking demand overall in the area, it is recommended that future occupiers access to on-street residents parking permits be restricted through the car free condition, and that future occupiers access to on-site parking spaces be restricted through a car park management plan condition.

- 9.3. The Design and Access Statement sets out that Sheffield stands for 6 cycles would be provided. The position of the cycle parking is not indicated on the plans, and as such it is recommended that further details be secured by condition to ensure the spaces are convenient, covered and secure.

## **9.4. Sustainability:**

Policy CP8 requires new development to achieve 19% above Part L for energy efficiency, and to meet the optional standard for water consumption. This can be secured by condition.

- 9.5. There are communal refuse and recycling facilities on the public highway in this area, and the kitchens are of a sufficient size for limited storage of waste. Therefore it is considered that a condition securing further details is not necessary.

## **10. EQUALITIES**

- 10.1. Policy HO13 seeks access standards above normal Building Regulations. It is noted that the proposed flats would be served by the central lift which would be wheelchair accessible. As the scheme could be accepted without the installation of the central lift, and a step free access could not be achieved without the lift, it is considered that a condition requiring compliance with the M4(2) Building Regulations Standard is not necessary.

