

<u>No:</u>	BH2019/02158	<u>Ward:</u>	Goldsmid Ward
<u>App Type:</u>	Full Planning		
<u>Address:</u>	15 Caburn Road & 203 Dyke Road Hove BN3 6EF		
<u>Proposal:</u>	Change of use from nursing home (C2) at No.15 Caburn Road and Sui Generis HMO at No.203 Dyke Road to 20no bedroom short term accommodation & services for the homeless (Sui Generis). Alterations to form single building, replacement ground floor windows & door to west elevation and associated works.		
<u>Officer:</u>	Emily Stanbridge, 293311	tel: <u>Valid Date:</u>	19.07.2019
<u>Con Area:</u>		<u>Expiry Date:</u>	13.09.2019
<u>Listed Building Grade:</u>		<u>EOT:</u>	
<u>Agent:</u>	Brighton And Hove City Council Hove Town Hall Hove BN3 4AH	Property And Design	1st Floor
<u>Applicant:</u>	Brighton And Hove City Council BN3 4AH	1st Floor Hove Town Hall	Hove

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.

Plan Type	Reference	Version	Date Received
Location and block plan	001		19 July 2019
Proposed Drawing	005		19 July 2019
Proposed Drawing	006	B	1 October 2019
Proposed Drawing	007	B	1 October 2019
Proposed Drawing	008		19 July 2019
Proposed Drawing	009		19 July 2019

2. The unit hereby approved shall only be occupied by a maximum of twenty (20) persons.

Reason: To ensure a satisfactory standard of accommodation for future occupiers and to comply with policy QD27 of the Brighton & Hove Local Plan.

3. All rooms annotated as kitchen/dining room, 1:1 assessment room or staff space as set out on drawings 005 received on 19th of July 2019, 006 B received on 1st of October 2019 and 007B received 6th on 1st of October

2019, shall be retained as communal space and shall not be used as a bedroom at any time.

Reason: To ensure a suitable standard of accommodation for occupiers and to comply with policy QD27 of the Brighton & Hove Local Plan.

4. Prior to first occupation a Management Plan shall be submitted to and approved in writing by the Local Planning Authority. This should include details relating to site management, behaviour and conduct of future occupiers, details of how parking will be allocated and enforced and waste/refuse management. The occupation and use of the building shall be in strict accordance with the approved management plan.
Reason: To safeguard the amenities of occupiers of the adjoining properties, to ensure parking provisions are effectively managed and to comply with SU10 and QD27 of the Brighton and Hove Local Plan, Policy CP9 of the Brighton and Hove City Plan Part One.
5. 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 QD14 of the Brighton & Hove Local Plan and CP12 of the Brighton & Hove City Plan Part One.
6. The development hereby permitted shall not be occupied 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 and provided in full in accordance with the approved details 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, policy CP8 of the Brighton & Hove City Plan Part One and Policy WMP3e of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Waste and Minerals Plan.
7. Prior to the first occupation of the development hereby permitted the applicant shall reinstate the redundant vehicle crossover [outside 15A Caburn Road] back to a footway by raising the existing kerb and footway.
Reason: In the interests of highway safety and to comply with policies TR7 of the Brighton and Hove Local Plan and CP9 of the City Plan Part One.
8. The hard surface hereby approved shall be made of porous materials and retained thereafter or provision shall be made and retained thereafter to direct run-off water from the hard surface to a permeable or porous area or surface within the curtilage of the property.
Reason: To reduce the risk of flooding and pollution and increase the level of sustainability of the development and to comply with policies CP8 & CP11 of the City Plan Part One.

9. Prior to first occupation of the development hereby permitted, details of secure cycle parking facilities for the occupants of, and visitors to, the development shall 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.

10. Prior to commencement of the development hereby permitted a plan detailing the positions, height, design, materials, type and construction method including of any mechanisms that might make them temporary and movable or temporary and removable of all existing and proposed boundary treatments shall have been submitted to and approved in writing by the Local Planning Authority. The boundary treatments shall be provided in accordance with the approved details prior to first occupation of the development and shall thereafter be retained at all times.
Reason: In the interests of highway safety and to enhance the appearance of the development in the interest of the visual and residential amenities of the area and to comply with policies TR7, TR14, QD15, QD27 and HE6 of the Brighton & Hove Local Plan and SA6, CP7, CP9, CP12, CP13 and CP15 of the City Plan Part One and 1980 Highways Act.

11. Prior to first occupation a scheme shall be submitted to the Local Planning Authority for approval to provide that the residents of the development, other than those residents with disabilities who are Blue Badge Holders, have no entitlement to a resident's parking permit. The approved scheme shall be implemented before occupation.
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 Brighton & Hove City Plan Part One and SPD14: Parking Standards.

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 applicant is advised that the proposed highways works should be carried out in accordance with the Council's current standards and specifications and under licence from the Streetworks team. The applicant should contact the Streetworks Team (permit.admin@brighton-hove.gov.uk 01273 290729) at their earliest convenience to avoid any delay.

3. The applicant is advised that advice regarding permeable and porous hard surfaces can be found in the Department of Communities and Local

Government document 'Guidance on the permeable surfacing of front gardens' which can be accessed on the DCLG website (www.communities.gov.uk).

4. In order to be in line with Policy TR14 Cycle Access and Parking of the Brighton & Hove Local Plan 2005 cycle parking must be secure, convenient (including not being blocked in a garage for cars and not being at the far end of a rear garden), accessible, well lit, well signed, near the main entrance, by a footpath/hardstanding/driveway and wherever practical, sheltered. It should also be noted that the Highway Authority would not approve vertical hanging racks as they are difficult for many people to use and therefore not considered to be policy and Equality Act 2010 compliant. Also, the Highway Authority approves of the use of covered, illuminated, secure 'Sheffield' type stands spaced in line with the guidance contained within the Manual for Streets section 8.2.22 or will consider other proprietary forms of covered, illuminated, secure cycle storage including cycle stores, "bunkers" and two-tier systems where appropriate.
5. The applicant is advised to contact the Council's Streetworks team (permit.admin@brightonhove.gov.uk or 01273 290729) at their earliest convenience to avoid delay and obtain all necessary highway approval including design, materials and construction method from the Highway Authority prior to any works commencing on and adjacent to the adopted (public) highway to satisfy the law and requirements of Condition 10.
6. The applicant is advised that the scheme required to be submitted by Condition 11 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 parking permits.

2. SITE LOCATION & APPLICATION DESCRIPTION

- 2.1. This application relates to two adjacent buildings on the junction of Old Shoreham Road and Dyke Road, on the opposite side of the road to BHASVIC.
- 2.2. Both 15 Caburn Road and 203 Dyke Road have previously been used as a joint care home. 203 Dyke Road obtained planning permission in 2012 for the change of use of the property to a sui generis HMO. Whilst the property sought to revert back to a Care Home in 2016 the applicant has advised that this was never implemented. 15 Caburn Road obtained approval in August 2019 for the change of use from C2 to a sui generis HMO.
- 2.3. Planning permission is sought for the change of use from nursing home (C2) at No.15 Caburn Road and Sui Generis HMO at No.203 Dyke Road to a 20no bedroom short term accommodation & services for the homeless (Sui Generis). The scheme also includes alterations to form single building,

replacement ground floor windows & door to west elevation and associated works.

3. RELEVANT HISTORY

203 Dyke Road

3.1. **BH2016/00160** Change of use from large house in multiple occupation (Sui Generis) to a residential institution (C2). Approved March 2016

3.2. **BH2012/03680** Change of use from residential care home (C2) to house of multiple occupancy. Approved May 2013

15 Caburn Road

3.3. **BH2019/01008** Change of use from care home (C2) to thirteen bedroom house in multiple occupation (sui generis) Approved August 2019

3.4. **BH2018/00014** Change of use from residential care home (C2) to 5no one bedroom dwellings and 3no two bedroom dwellings (C3). Roof alterations including the extension of existing flat roof, installation of dormers, revised fenestration and associated alterations. Refused September 2018

3.5. **BH2013/03487** Change of Use from Care Home (C2) to House in Multiple Occupation. (Sui generis) (Part-Retrospective) Refused April 2017

3.6. **BH2012/01687** Extension and roof alterations to residential care home to create 1no 1 bed self-contained staff flat at second floor level. Erection of porch to West elevation and fenestration alterations. Refused August 2012

4. CONSULTATIONS

External

4.1. Sussex Police

There were 5 instances of reported crime on or near the above location during the last 12 months as reported by the Home Office for this location. The Design and Access Statement (DAS) submitted in support of the application states that there will be 24 hour staffing, 365 days a year by professionally trained staff at the location. Given the above levels of reported crime obtained from Police.uk there is no evidence to foresee any impact, that the proposed application will have on the immediate location, neighbouring residents and occupiers.

4.2. In order to create a safe and secure environment for the residents of the premises, it is recommend that any new external communal doors conform to LPS 1175 SR2 or its equivalent and has access control fitted, any ground floor or easily accessible windows are to conform to PAS-24-2016 or its equivalent. It is recommend that all existing external doors and easily accessible windows are checked to ensure they are adequate and fit for purpose and do not reduce the overall security of the building by creating weak points.

- 4.3. In order to create a safe and secure communal environment for residents occupying blocks of multiple flats, bedsits or bedrooms, and to reduce the opportunity for antisocial behaviour by restricting access to all areas and floors of the building to all residents, SBD (Seure by design) asks for compartmentalisation. SBD seeks to curtail unlawful free movement throughout the building through the use of an access control system (compartmentalisation).
- 4.4. In this particular instance where the two building have been combined to form a single building, and additional emergency egress for the residents have been created and compartmentalisation is a consideration, it is recommend that the interconnecting doors between the two buildings remain locked but linked to the fire alarm system which are then opened once the alarm activates. This arrangement limits unnecessary access to all residential rooms whilst still retaining additional emergency fire egress.
- 4.5. Existing individual rooms should be checked to ensure they are adequate and fit for purpose with locks conforming to BS 3621 or BS 8621 accordingly. They should also incorporate a door viewer and security chain. Where any room door is to be replaced it is to conform to PAS24-2016 as well as adhering to fire regulations.
- 4.6. It is recommend that the proposed open cycle racks are upgraded to secure cycle shelters in order to provide the residents with a safe and secure environment to secure their cycles. These should be located in view of the building with natural surveillance over them so that attempts to tamper or steal from them will be in full view of the street. Where possible the street lighting or the premises lighting scheme should be designed to ensure that the cycle storage is well illuminated.

Internal

- 4.7. **Policy: No objection**
Loss of HMO accommodation
 Retained Policy HO14 in the 2005 Local Plan seeks to protect against the loss of HMOs, stating that planning permission will not be granted for proposals involving the net loss of units of non self-contained accommodation which comply with, or are realistically capable of reaching, the standards set out in the Housing Acts, other than in specific circumstances set out in the policy. In this case, the application would retain the use of the buildings as non self-contained accommodation in the form of temporary accommodation for homeless people. Therefore, the application cannot be considered to conflict with Policy HO14.
- Suitability for homeless accommodation
- 4.8. Policy CP19 in CPP1 makes provision to meet the accommodation requirements of specific groups within the city. More specifically, retained Policy HO10 in the 2005 Local Plan states that planning permission will be granted for the provision of residential accommodation, including temporary accommodation and hostels, to meet the needs of homeless people,

provided that the site is well served by local community services, public transport and walking and cycling routes.

- 4.9. In this case, the application site an accessible location within close walking distance of Seven Dials which provides a range of shops, cafes and other facilities and is designated in the City Plan as a 'Local centre'. The site is also well served by regular bus services providing easy access to other parts of the city.
- 4.10. **Sustainable Transport:** No objection subject to condition
- 4.11. **Private Sector housing:** Comment
It's unclear from the application regarding the provision of meals for the residents, if the clients are cooking for themselves then there appears to be a lack of kitchen space and cooking facilities, which would not meet licensing standards.
- 4.12. The standards ensure that HMOs provide a good level and standard of accommodation and facilities, so it is hoped that similar standards would be achieved even if not licensable.
- 4.13. There is concern with the number of occupants there may an increased likelihood of hazards in accordance with the Housing Health & Safety Rating System under the Housing Act 2004, such as; Crowding and Space, Food Safety Collisions, Cuts and Strains, Fire.

5. REPRESENTATIONS

- 5.1. **Five (5)** letters of representation have been received objecting to the proposed development on the following grounds:
- Additional traffic
 - Impact on property value
 - Noise
 - Overdevelopment
 - Overshadowing
 - Restriction of views
 - The short term accommodation would mean continual movement of people
 - Safety of neighbouring residents
 - Loss of privacy
 - Potential for anti-social behaviour
 - The number of people moving in will create congestion on pavements which are used by many
 - Will impact the character of the area
 - Need to ensure adequate security
 - Concerns over the entering, exiting and waiting of service users outside the building will be managed
 - Potential risks of the development being located opposite a school of young vulnerable students

- Safety of children in the area given the close proximity of schools in the area
- Potential to create additional parking needs

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);
- 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. RELEVANT POLICIES

The National Planning Policy Framework (NPPF)

The Town and Country Planning (General Permitted Development) Order 2015 (as amended) (GPDO)

Brighton & Hove City Plan Part One

SS1	Presumption in Favour of Sustainable Development
CP1	Housing delivery
CP8	Sustainable buildings
CP9	Sustainable transport
CP12	Urban design
CP19	Housing mix
CP21	Student housing and Housing in Multiple Occupation

Brighton & Hove Local Plan (retained policies March 2016)

TR7	Safe Development
TR14	Cycle access and parking
QD14	Extensions and alterations
QD27	Protection of amenity
HO5	Provision of private amenity space in residential development
HO10	Accommodation for homeless people
HO13	Accessible housing and lifetime homes
HO14	Houses in multiple accommodation

8. CONSIDERATIONS & ASSESSMENT

The main considerations in the determination of this application relate to the principle of the use of the building, the design changes proposed and their impact on the host buildings, standard of accommodation to be provided, impact on neighbouring properties and any transport issues.

Principle of development

Loss of the existing use

- 8.1. The application site comprises two adjoining properties which were previously used jointly as a residential care home (C2). The use of these properties as a care home ceased in 2013. Whilst the last use of 15 Caburn Road was as a care home, planning permission BH2019/01008 approved in August 2019, granted a change of use to a thirteen bedroom sui generis HMO. This application considered the loss of the care home as acceptable. 203 Dyke Road obtained planning permission in 2012 for a change of use to a Sui Generis HMO. The site is currently registered as a sui generis HMO. The two properties although operating independantly are now vacant.
- 8.2. This application is accompanied by a statement prepared by GC Care Consultancy which provides strong evidence that the properties do not comply and are not realistically capable of reaching the current standards for residential care as required by the council and the care quality commission.
- 8.3. Both the extant permission at 15 Caburn Road and the last known use of 203 Dyke Road relate to sui generis HMO accommodation. Policy HO14 states that:
'Planning permission will not be granted for proposals involving the net loss of units of non self-contained accommodation which comply with, or are realistically capable of reaching, the standards set out in the Housing Acts.'
- 8.4. However as this application proposes to retain the use of the buildings as non self-contained accommodation in the form of temporary accommodation for homeless people, the application is therefore not considered to conflict with the aims of Policy HO14.

Suitability of the site for homeless accommodation

- 8.5. The proposed development will result in the joining of 15 Caburn Road and 203 Dyke Road. The proposed accommodation will offer a 20 bed assessment service for single homeless people and rough sleepers with a range of support and accommodation needs. The service will operate a 24 hours service, 365 days a year
- 8.6. The accommodation will have no minimum stay but will have a maximum stay of 28 days. The Service Provider will complete initial triage assessments for individuals for a range of support needs including physical health, mental health and substance misuse. The aim of this will be to identify those who are already positively engaged with services which are meeting their needs and those who require a fuller assessment from a specialist service or a referral to a service.

- 8.7. It will be ensured that Service Users understand the temporary nature of the service and are prepared for a move on within 28 days of their stay. In addition the Service Provider will ensure throughput and move on is maintained to allow a regular supply of places for referrals. The service will operate in a way such that Service Users do not develop unrealistic expectations regarding the type or location of accommodation that then become barriers to move on.
- 8.8. Policy HO10 states that:
'Planning permission will be granted for the provision of residential accommodation, including temporary accommodation and hostels, to meet the needs of homeless people, provided that the site is well served by local community services, public transport and walking and cycling routes.'
- 8.9. The application site is considered to be in an accessible location as it is within close walking distance of Seven Dials which comprises of a range of shops, cafes and other services and facilities. Seven Dials is designated within the City Plan as a 'Local Centre'. In addition the site is also well served by regular bus services providing easy access to other parts of the city.
- 8.10. In addition Policy CP19 of the Brighton and Hove City Plan Part One makes provisions to meet the accommodation requirements of specific groups within the city. This policy seeks to ensure that an appropriate mix of housing is achieved across the city and that a range of housing options are available.
- 8.11. The principle of the use of the site for short term accommodation for the homeless is considered to be acceptable.

Design and Appearance

- 8.12. The only external changes proposed are to the western elevation of the site which faces onto Caburn Road. The existing half glazed porch to the front of the property is to be replaced with a solid entrance porch of the same depth and height. The porch will additionally feature two single window openings and a single front entrance door. These proposed works are considered to be in keeping with the building. In addition a door located south of the main entrance will be replaced with a single window opening to serve a bedroom. Notwithstanding the plans submitted, a condition is sought to ensure that the materials of the proposed extension match that of the host property. These alterations are considered to result in a coherent appearance to this front elevation in line with Policy CP12 of the Brighton and Hove City Plan Part One and Policy QD14 of the Brighton and Hove Local Plan.

Impact on Amenity

- 8.13. 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. Only minor physical external alterations are proposed to the western side of the application site, facing onto Caburn Road and away from immediate neighbouring properties. Therefore no impact is identified to neighbouring amenity by way of overshadowing. In addition, the only new window opening is to the western elevation facing onto Caburn Road, which replaces a doorway, which would not result in any additional loss of privacy to neighbouring occupiers. The external alterations proposed are therefore in line with Policy QD27 of the Brighton and Hove Local Plan.
- 8.15. There are residential properties sited in the immediate vicinity of the application site on Dyke Road and Caburn Road. Whilst it is noted that the proposed use could have an impact upon immediate neighbours due to the activity levels and comings and goings associated with the number of occupiers proposed in conjunction with the short term nature of the site, it is considered that this impact is limited given that both application properties are already authorised as large HMOs, albeit currently vacant but could be re-opened without the need for planning permission.
- 8.16. In addition the impact on neighbours is further reduced given that the application properties do not physically adjoin neighbouring dwellings. The application site is separated from No.11 Caburn Road by a small alleyway. In addition No.201 Dyke Road adjacent to the east is separated from the application property via a small area of external amenity space. It is considered that the use of short term accommodation subject to a maximum of 20 occupiers could be maintained in a fashion which would not cause significant harm to neighbouring amenity. Full details of a management plan and its implementation are to be secured by planning condition.
- 8.17. The planning history of the site is also a material planning consideration. No.15 Caburn Road has extant planning permission for a 13 bedroom HMO. In addition 203 Dyke Road, as approved in 2012, shows a layout to facilitate a 10no. bedroom HMO. As such the number of occupiers of both the consented schemes and that proposed is similar.
- 8.18. Whilst the size of the proposed scheme is deemed acceptable, to ensure occupancy levels to not exceed this, a suitably worded condition will be attached to any permission given to secure the number of future occupiers and to retain all communal facilities to ensure there would be no future increase in the number of bedrooms as well as ensuring the limited communal spaces and support areas are maintained.
- 8.19. Some concerns have been raised by neighbours regarding the potential for anti-social behaviour as a result of the development. However Sussex Police have confirmed that given the crime levels reported by the Home Office in this location in addition to the supporting information submitted as part of the application which states that the site will be staffed 24 hours a day, 365 days a year by professionally trained staff, that there is no evidence to foresee any impact that the proposed development will have on the immediate location or neighbouring residents.

Standard of accommodation

- 8.20. The accommodation proposed is to house homeless people and rough sleepers with a local connection to Brighton and Hove. The service will offer short term accommodation for 28 days. The proposed development would result in 20 single bedrooms, shared kitchen/dining facilities, bathroom facilities, 1:1 assessment rooms and staff and office space to the ground floor.
- 8.21. At ground floor level the property comprises of: 6 bedrooms, 4 showers, 4 W/C's, kitchen, living/dining space, a reception/office for staff and secondary staff space.
- At first floor level the property comprises of: 10 bedrooms, 3 communal showers, 1 private shower, 4 communal W/C's and 2 private W/C's , a kitchen/dining area and two 1:1 assessment rooms
 - At second floor level the property comprises of: 4 bedrooms, 3 showers, 4 W/C's and a kitchen/dining room.
 - The proposed use would provide the following by way of communal living accommodation:
 - 49sqm at ground floor
 - 28sqm at first floor
 - 10sqm at second floor
 - In total the accommodation would provide a total of 77sqm of communal living space for future occupiers.
- 8.22. Given that the proposed accommodation is a short term service to equip service users with life skills and then promptly move them on to more suitable longer term accommodation, only a single living room has been provided on the ground floor. The applicant has justified this by stating that any further increase in communal living space, which would result in a loss of bedrooms, would detract from the aims of the service which is to encourage independence. The applicant is concerned that additional living facilities may make future occupiers feel as though they are in longer term accommodation rather than a short term place of personal development.
- 8.23. 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 as measuring 11.5sqm.
- 8.24. Given that the size of the bedrooms proposed all exceed the floor space of a single bed space, as set out above, it is considered that residents would have sufficient floor space within individual bedrooms and the communal space provided to receive an adequate standard of accommodation.

- 8.25. Each of the single bedrooms proposed measures between 8sqm and 16sqm. For the reasons set out above the proposed accommodation will be conditioned so that each bedroom is single occupancy only. Each bedroom is considered to provide a useable floor area with sufficient circulation space.
- 8.26. Each of the habitable rooms proposed are considered to benefit from acceptable levels of outlook, light and ventilation and are therefore deemed acceptable on these grounds in compliance with QD27 of the Brighton and Hove Local Plan.
- 8.27. It is noted the Sussex Police made a recommendation on how compartmentalisation could be implemented in order to create a safe and secure communal environment for future occupiers by restricting access to all areas and floors of the building to all residents. However most commonly this Secure By Design, Homes 2019 guidance is applied to properties of more than 25 bedrooms.
- 8.28. In this instance this would not be possible due to the location of communal rooms, namely that bedrooms 8-12 on the first floor would be unable to access the kitchen/diner, and the bedrooms on the other side of the first floor would have reduced access to washing facilities; similarly on the second floor, bedrooms 18-21 would not be able to access the kitchen. Sussex Police have confirmed that they have no concerns from a crime prevention perspective with the layout proposed.
- 8.29. The accommodation proposed is considered to form acceptable accommodation in line with Policy QD27 of the Brighton and Hove Local Plan.

Sustainable transport

Cycle access and parking

- 8.30. The site is adjacent to a feeder cycle route along Old Shoreham Road that will link future occupants of site by cycle with National Cycle Network Regional Route 82, the Seafront, the City Centre, the South Downs National Park and beyond in all directions.
- 8.31. For this development of 10 staff and 20 bed spaces the minimum cycle parking standard is 5 cycle parking spaces in total (2 spaces for staff and 3 spaces for visitors). Further details of the cycle parking proposed are sought by condition.

Pedestrian access

- 8.32. The applicant is not proposing changes to pedestrian access arrangements onto the adopted (public) highway however the applicant is proposing to close the southern pedestrian entrance into the building from Caburn Road (leaving the main front entrance from Caburn Road and 2 rear entrances from Dyke Road and Old Shoreham Road) and for this development this is deemed acceptable.

Vehicular access

- 8.33. The applicant is proposing changes to the existing vehicle access arrangements onto the adopted (public) highway from the Caburn Road side of the building, by way of removing the existing off-street parking space and for this development this is deemed acceptable in principle. Therefore the Highway Authority requests the reinstatement of Redundant Vehicle Crossing on Caburn Road.
- 8.34. In addition, to prevent any future illegal car parking on-site appropriate boundary treatments will be required and are sought by condition. Furthermore any remaining hardstanding should be porous and/or permeable and no surface water should run off.

Car Parking

- 8.35. The applicant is proposing 0 car parking spaces. The proposed level of car parking is in line with the maximum standards and is therefore deemed acceptable.
- 8.36. Regarding on-street parking permits and car-free housing, Caburn Road is located in Controlled Parking Zone (CPZ) O. Records from January to September 2018) show the average percentage permit uptake to total permit allocation to be 92%. The most recent records for the month of September 2018 show 95%. The Highway Authority considers that these levels of uptake demonstrate that the CPZ is likely to be over-capacity.
- 8.37. It is acknowledged that it is unlikely that future occupiers would have vehicles and in addition aren't intended to reside at the property long enough to go through the application process of a parking permit. However given that the future occupiers of the property could alter, it is considered necessary to include this condition.

Trip generation

- 8.38. There is not forecast to be a significant increase in vehicle trip generation as a result of these proposals therefore any impact on carriageways will be minimal and within their capacity so the application is deemed acceptable and developer contributions for carriageway related improvements will not be sought.

9. EQUALITIES None identified