

<u>No:</u>	BH2025/01792	<u>Ward:</u>	Brunswick & Adelaide Ward
<u>App Type:</u>	Full Planning		
<u>Address:</u>	First Floor And Second Floor Flat 7 St Johns Place Hove BN3 2FJ		
<u>Proposal:</u>	Planning permission is sought for external alterations including new fenestration, timber stable entrance door, repairs and restoration of the brickwork, new slate roof tiles, refurbishment of the existing flat roofed dormer with a new recessed internal roof terrace.		
<u>Officer:</u>	Charlotte Tovey, tel: 202138	<u>Valid Date:</u>	20.08.2025
<u>Con Area:</u>		<u>Expiry Date:</u>	15.10.2025
<u>Listed Building Grade:</u>		<u>EOT:</u>	07.11.2025
Agent:	ECE Planning Limited 64-68 Brighton Road Worthing BN112EN		
Applicant:	Ms Shadi Danin First Floor And Second Floor Flat 7 St Johns Place Hove BN3 2FJ		

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
Proposed Drawing	BCO 2004	00	15-Oct-25
Report/Statement	Heritage Statement	PL3	14-Oct-25
Location Plan	BCO 1000	00	18-Jul-25
Proposed Drawing	BCO 2001	02	15-Oct-25
Proposed Drawing	BCO 2002	02	15-Oct-25
Proposed Drawing	BCO 2003	01	15-Oct-25
Proposed Drawing	BCO 1003	02	17-Oct-25
Block Plan	BCO 1001	00	18-Jul-25

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 permission

3. The development hereby permitted shall not be commenced until samples of the following materials to be used in the construction of the external surfaces of the development hereby permitted have been submitted to and approved in writing by the Local Planning Authority:
 - a) Details of brick and tiling (including details of the colour of paintwork to be used on the timber stable door)
 - b) Details of all cladding to be used, including details of their treatment to protect against weatheringDevelopment shall be carried out in strict accordance with the approved details.
Reason: To ensure the satisfactory preservation of this listed building and to comply with policies DM27 of Brighton & Hove City Plan Part 2, and CP15 of the Brighton & Hove City Plan Part One
4. No works shall take place to the windows until full details of all sash window(s) and their reveals and cills including 1:20 scale elevational drawings and sections and 1:1 scale joinery sections have been submitted to and approved in writing by the Local Planning Authority. The windows shall be hardwood timber framed 12mm slimline double hung vertical sliding sashes with concealed trickle vents. The works shall be carried out and completed fully in accordance with the approved details and maintained and retained as such thereafter.
Reason: To ensure the satisfactory preservation of this listed building and to comply with policies DM27 of Brighton & Hove City Plan Part 2, and CP15 of the Brighton & Hove City Plan Part One
5. No cables, wires, aerials, pipework meter boxes, ventilation grilles, flues, rainwater goods shall be fixed to or penetrate any external elevation, other than those shown on the approved drawings, without the prior consent in writing of the Local Planning Authority.
Reason: To ensure the satisfactory preservation of this listed building and to comply with policies DM27 of Brighton & Hove City Plan Part 2, and CP15 of the Brighton & Hove City Plan Part One.
6. The rooflight(s) hereby approved shall have steel or cast metal frames, colour-finished black or dark grey, fitted flush with the adjoining roof surface and shall not project above the plane of the roof.
Reason: To ensure the satisfactory preservation of this listed building and to comply with policies DM27 of Brighton & Hove City Plan Part 2, and CP15 of the Brighton & Hove City Plan Part One.
7. All embedded steel to be removed from the masonry and affected areas made good in matching material to include lime based mortar and brick. Surfaces to be finished to match the profile, texture and colour of the surrounding wall and retained as such thereafter.
Reason: To ensure the satisfactory preservation and appearance of this listed building and to comply with policies DM27 of Brighton & Hove City Plan Part 2 and CP15 of the Brighton & Hove City Plan Part One
8. The works hereby permitted shall not take place until full details of the proposed new internal doors including 1:20 scale sample elevations and 1:1 scale joinery profiles have been submitted to and approved in writing by the Local Planning

Authority. All existing doors are to be retained, except where indicated on the drawings hereby approved. New doors shall be of traditional timber panel construction. Any fireproofing to doors should be an integral part of the door construction, and self-closing mechanisms, if required, shall be of the concealed mortice type.

Reason: To ensure the satisfactory preservation of this listed building and to comply with policies DM27 of Brighton & Hove City Plan Part 2 and CP15 of the Brighton & Hove City Plan Part One

9. All existing architectural features including staircases, balustrades, windows, doors, architraves, skirtings, dados, picture rails, panel work, fireplaces, tiling, corbelled arches, cornices, decorative ceilings and other decorative features shall be retained except where otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the satisfactory preservation of this listed building and to comply with policies DM27 of Brighton & Hove City Plan Part 2, and CP15 of the Brighton & Hove City Plan Part One

10. The works hereby permitted shall not take place until full details of the proposed works including 1:20 scale sample elevations and sections and 1:1 scale joinery profiles of the new staircases have been submitted to and approved in writing by the Local Planning Authority. The works shall be implemented in strict accordance with the agreed details and maintained as such thereafter.

Reason: As insufficient information has been submitted, to ensure the satisfactory preservation of this listed building and to comply with policies DM27 of Brighton & Hove City Plan Part 2, and CP15 of the Brighton & Hove City Plan Part One.

11. Soundproofing of the party walls between no. 6 and no. 8 shall be implemented prior to the first occupation of the development and shall thereafter be retained as such.

Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies DM20 and DM40 of Brighton & Hove City Plan Part 2.

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. Based on the information available, this permission is considered to be one which will not require the approval of a biodiversity gain plan before development is begun because one or more of the statutory exemptions or transitional arrangements are considered to apply. These can be found in the Environment Act 2021.
3. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that, unless an exception or a transitional arrangement applies, the planning permission granted for the development of land in England is deemed

to have been granted subject to the condition ("the biodiversity gain condition") that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

- 4. The applicant is advised that under Part 1 of the Wildlife and Countryside Act 1981 disturbance to nesting wild birds, their nests and eggs is a criminal offence. The nesting season is normally taken as being from 1st March - 30th September so trees and scrub on the site should be assumed to contain nesting birds between these dates, unless a recent survey has been undertaken by a competent ecologist to show that it is absolutely certain that nesting birds are not present. The developer should take appropriate steps to ensure nesting birds, their nests and eggs are not disturbed and are protected until such time as they have left the nest. Planning permission for a development does not provide a defence against prosecution under this Act.
- 5. The applicant is advised of the possible presence of bats on the development site. All species of bat are protected by law. It is a criminal offence to kill bats, to intentionally or recklessly disturb bats, damage or destroy a bat roosting place and intentionally or recklessly obstruct access to a bat roost. If bats are seen during construction, work should stop immediately and Natural England should be contacted on 0300 060 0300.

2. SITE LOCATION

- 2.1. The application site relates to a mid terraced dwellinghouse on the southern side of the mews at no. 7 St Johns Place, located at the north east end of First Avenue. The building occupies part of the ground floor, first floor and converted loft space. The west garage is not owned by the applicant and does not form part of this application.
- 2.2. This property is part of the Grade II listed mews buildings '1-7 St John's Place and 56 First Avenue', within The Avenues Conservation Area. The mews is an original element of the layout of the Stanford Estate by James Knowles and retains much evidence of its original purpose as service accommodation for the grander town houses of the estate, with ground floor carriage/coach entrances and first floor loading/winch-doors.
- 2.3. The mews is currently in use as a mixture of residential premises with some commercial businesses operating from the ground floor garages.

3. APPLICATION DESCRIPTION

- 3.1. Planning permission is sought for external and internal alterations including new fenestration, new timber stable entrance door, repairs and restoration of the brickwork, new slate roof tiles, refurbishment of the existing front and rear flat roofed dormers with the rear dormer remodelled as a new recessed internal roof terrace.

- 3.2. The proposal has been amended during the course of the application to remove an originally proposed lift, removal of a newly proposed front window and to amend the entrance doors on the front elevation.

4. RELEVANT HISTORY

- 4.1. **PRE2025/00094** Pre application advice was sought by the applicant and following a site visit by the heritage officer in June 2025 advice was issued on the external and internal alterations proposed.

5. REPRESENTATIONS

- 5.1. In response to publicity, responses were received from seven (7) individuals, objecting to the application and raising the following issues:
- The alterations would be detrimental to the Listed Building and Conservation Area
 - Noise disturbance from the new internal layout and recessed balcony
 - Concerns that the plans are inaccurate and not compliant with Building Regulations
 - Concerns on structural integrity
 - Concerns of drainage and rainwater run off
 - Loss of parking
 - The balcony is not in keeping with the heritage of the area
 - Concerns to the future use of building as an Airbnb
 - Loss of privacy from the proposed balcony
 - Detrimental affect on property value

6. CONSULTATIONS

- 6.1. **Heritage:** No objection subject to conditions
Initial consultation received on the 18.09.2025
- 6.2. The internal changes are likely to be acceptable (with the exception of the lift) when weighed against heritage benefits. Notwithstanding possible amenity issues, the design of the rear balcony is acceptable and would be an improvement on the existing poorly designed dormer. A more robust heritage statement is needed and amendments to the internal layout removing the lift that was not included in the plans when pre application advice was sought.

Updated plans received 13.10.2025

- 6.3. Amendments have been made to the proposal including the removal of the previously proposed lift, the removal of the ground floor north elevation slot window, a revised stair configuration that retains the existing first to second floor staircase to minimise alteration to the spine wall. A new Georgian period style timber staircase is now proposed to replace the existing open treaded stairs.

Amendments have also been made to the entrance door from the courtyard to introduce a new timber stable door. An internal glass lobby is now proposed.

Updated Heritage consultation received on the 14.10.2025

- 6.4. The applicant has submitted a revised heritage statement, which now meets the requirements of paragraph 207 of the NPPF. The proposed lift has been omitted, which is welcome. I am now content that the overall impact would be neutral, with a degree of harm and some clear direct heritage benefits/enhancements resulting in an overall acceptable scheme.

Highways: No objection

- 6.5. Verbal comments concluded that the loss of the garage as vehicle parking is not considered to have a significant impact on the highway network and therefore no objection is raised.

7. MATERIAL CONSIDERATIONS

- 7.1. 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.
- 7.2. The development plan is:
- Brighton & Hove City Plan Part One (adopted March 2016);
 - Brighton & Hove City Plan Part Two (adopted October 2022);
 - East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (adopted February 2013; revised October 2024);
 - East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (adopted February 2017);
 - Shoreham Harbour JAAP (adopted October 2019).

8. POLICIES

The National Planning Policy Framework (NPPF)

Brighton & Hove City Plan Part One

SS1	Presumption in Favour of Sustainable Development
CP9	Sustainable transport
CP10	Biodiversity
CP12	Urban design
CP15	Heritage

Brighton & Hove City Plan Part Two

DM1	Housing Quality, Choice and Mix
DM18	High quality design and places
DM20	Protection of Amenity
DM21	Extensions and alterations
DM26	Conservation Areas
DM27	Listed Buildings

DM29	The Setting of Heritage Assets
DM33	Safe, sustainable and active travel
DM36	Parking and servicing
DM37	Green Infrastructure and Nature Conservation

Supplementary Planning Guidance:

SPGBH11 Listed Building Interiors

Supplementary Planning Documents:

SPD09	Architectural Features
SPD11	Nature Conservation & Development
SPD12	Design Guide for Extensions and Alterations
SPD14	Parking Standards
SPD17	Urban Design Framework

Other Documents

The Avenues Conservation Area character statement

9. CONSIDERATIONS & ASSESSMENT

- 9.1. The main considerations in the determination of this application relate to the impact of the alterations on the Grade II Listed Building, their impact on the setting of the listed buildings within the Mews, and the wider Avenues Conservation Area. The impact of the development on neighbouring amenity and the impact on the highway are also key considerations.
- 9.2. In considering whether to grant listed building consent the Council has a statutory duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Moreover, when considering whether to grant listed building consent for development in a conservation area the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the area.
- 9.3. Case law has held that the desirability of preserving a listed building or its setting or any features of special architectural or historic interest it possesses, and the desirability of preserving or enhancing the character or appearance of a conservation area should be given "considerable importance and weight".

Design, appearance and impact upon heritage assets

- 9.4. The proposal seeks to undertake internal and external alterations to the Grade II Listed Building.

Existing Appearance

- 9.5. The application site has undergone many alterations in the past with previous ownership that has resulted in the loss of historic architectural features such as loss of the original windows and coach doors, fitment of a modern front door between the original openings, fitment of UPVC windows and juliette balconies

on the first floor level, large rear and front dormers have all diluted the historic significance of the building.

- 9.6. These unsympathetic alterations have caused harm to the host property and the group of adjacent listed assets as well as the character and appearance of the Conservation Area. Internally many original features and plan form has been removed and the previous installation of a modern staircase to first and floor and attic level has diluted the significance of the listed building to a high level.

Engagement with the agent and the LPA

- 9.7. Initial pre application advice following a site visit from the heritage officer concluded that the overall poor condition of the building, both in terms of historic fabric and standard of accommodation. The interior of the heritage asset retains a fairly limited degree of historic character, however the original plan form remains legible.
- 9.8. During the course of the application satisfactory amendments have been received as described below and an updated Heritage Statement has been submitted PL3 dated 14.10.2025.

Front & Rear External Alterations

- 9.9. The plans seek to remove the non original UPVC door and glazing on the front and rear elevations including the removal of the juliette balconies.
- 9.10. The proposals include a new timber 'stable door' to the ground floor front elevation as the main entrance to the building and timber framed sash windows at first floor level (front and rear) to reflect the design of the lost fenestrations. The drawings confirm that the new sash windows would be slimline 12mm hardwood timber units painted in off white. The glazing pattern would be similar to the design of no. 6 St Johns Place and the proposed windows would be a welcome change to the principle and rear elevations. A condition is attached requiring joinery details are submitted to the LPA for approval prior to installation in order to secure appropriate detailing.
- 9.11. The heritage statement and drawings confirm that the brickwork would be cleaned and repointed in lime mortar where necessary and the non original juliette balconies carefully removed. A condition is recommended to ensure that where removed the surrounding brickwork is repaired and restored to match the existing. Further conditions are recommended to require joinery details of the glazing and entrance door, details of proposed materials and a further condition is recommended to ensure where features are removed the existing brickwork is cleaned and replaced to match.
- 9.12. Overall the proposed alterations to the front and rear elevations would result in an improvement to the appearance of the Grade II Listed Building resulting in several heritage benefits to the host property and also to the mews and other adjacent and nearby Listed Buildings.

Roof Alterations

- 9.13. The application also proposes to replace the existing red brown concrete roof tiles with natural slate tiles and the chimney stacks are proposed to be repaired. A new rooflight is proposed to the rear roof and all existing plastic rainwater goods are proposed to be replaced with heritage style UPVC fittings designed to replicate cast iron. Whilst this material is not commonly acceptable on a Listed Building in this case given the other heritage benefits and resulting appearance, this is considered acceptable in this instance.
- 9.14. The front and rear dormers would be remodelled and re-finished with zinc / aluminium standing seam roof and cladding. The new windows within the front dormer would be dark grey aluminium to match the appearance of the neighbouring properties on the principle elevation.
- 9.15. The rear dormer would be remodelled and mostly removed where it projects from the roofslope to create instead a recessed balcony with larger sliding doors set into the roofspace. An aluminium handrail and glazed balustrade are also proposed. Notwithstanding amenity considerations (that are considered under the associated full planning application), the re-design of the rear dormer with the proposed recessed balcony is in this instance considered acceptable. The proposal is considered to be an improvement on the existing poorly designed dormer. The existing dormer has been constructed with modern materials that jar with the other roof materials of the mews. Both front and rear dormers are visible from the public realm and the alterations are considered to be an improvement to the buildings character and appearance. Whilst it is unclear exactly when the dormers were constructed they have certainly been in place since 2011 and it would not be deemed reasonable to require their complete removal. The recessed design of the rear dormer is considered to lessen its impact overall and would have less visibility from the streetscene. The high level nature of the alteration together with the height of the building to the south at no. 54 First Avenue. would result in the appearance being suitably minimised and the proposed alterations would not negatively impact upon the Conservation Area.
- 9.16. The amendments to the front and rear dormers are considered to be overall enhancements to the appearance and historic character of the building as they replace and improve some of the more harmful alterations that have been previously taken place at the property.
- 9.17. Conditions are attached requiring joinery details of the glazing and door and details of materials for making good the front elevation of the building from the removal of the non original door and balconies that must be carefully removed and existing brickwork cleaned and replaced to match.
- 9.18. Whilst some of the proposed alterations are considered to result in less than substantial harm to the building these alterations are balanced with a number of benefits to the appearance and historic character of the building resulting in a neutral and acceptable impact overall.
- 9.19. The proposed alterations would not harm the historic character or appearance of the Grade II Listed building or wider conservation area, in accordance with

policies CP12 and CP15 of the Brighton & Hove City Plan Part One and policies DM18, DM21, DM26, DM27 and DM29 of the Brighton & Hove City Plan Part Two.

Impact upon neighbouring amenity

- 9.20. DM20 states Planning permission for development including change of use will be granted where it would not cause unacceptable loss of amenity to the proposed, existing, adjacent or nearby users, residents, occupiers or where it is not liable to be detrimental to human health.
- 9.21. Concerns were raised that the proposed recessed balcony would result in a loss of privacy to neighbouring properties. A site visit has been conducted to assess the impact of the proposed development which concluded that the view from the existing rear dormer windows to the south would be the same as the proposed recessed balcony. The plans do not seek to extend the balcony any closer to neighbouring properties or elevate the position of the balcony.
- 9.22. The recessed terrace would largely face onto the blank façade of the northern elevation of 54 First Avenue. It is acknowledged that there would be some view towards neighbouring habitable windows however this would remain similar to the existing situation. There is a flat roof sited lower on the northern elevation of 54 First Avenue which is in use as an outdoor space by the occupiers of the neighbouring building. Notwithstanding this the existing relationship between no. 7 and the southern neighbour at no. 54 would not be detrimentally altered from this development where mutual overlooking already exists in close proximity due to the dense nature of the overall built environment. As the development does not result in a view any higher or closer than the existing arrangement the recessed balcony would not cause demonstrable harm through overlooking to warrant refusal in this instance.
- 9.23. As no enlargement of the property is included in the proposal there would be no impacts to neighbouring properties in terms of loss of outlook, overbearing or loss of light/overshadowing.
- 9.24. Concerns have been raised in the representations that the balcony would result in a detrimental level of noise to the adjoining neighbours. The use of the building is for a residential C3 dwelling that offers 3 bedroom family accommodation and is not proposed to be changed. The use of a terrace of this size is not considered to likely to cause any concerns of disturbance outside the normal use of any outside amenity area. Concerns have also been raised that the property may be utilised for short term lettings in the future. Any future use of the building as an Airbnb or HMO would likely require planning permission and this is not something which has been proposed by the applicant.
- 9.25. Representations have raised concerns that the new layout includes moving the communal living area and kitchen to the converted roof space and this would result in noise disturbance. A condition is recommended requiring soundproofing is fitted to the converted loft party walls so that the relocation of the communal living area to the loft does not result in a detrimental level of noise to the adjoining neighbours from its use.

- 9.26. The proposal is considered to have an acceptable impact upon neighbouring residential amenity and would not cause demonstrable harm in accordance with policies DM20 and DM21 of the Brighton and Hove City Plan Part Two.

Biodiversity

- 9.27. The wildlife assessment submitted with the application did not consider the roof alterations would impact a protected species that required further assessment. The site does not lie within a 200m of woodland. An informative is attached in regards to nesting birds and bats.
- 9.28. This scheme was considered exempt from the need to secure mandatory biodiversity net gain under Schedule 7A of the TCPA because it does not impact a priority habitat or habitat of more than 25sqm or 5m of linear habitat.
- 9.29. The proposal would therefore accord with policy DM37 of City Plan Part Two and CP10 of City Plan Part One.

Sustainable Transport

- 9.30. The proposal would result in a loss of existing garage for off road parking of 1 vehicle. Concerns were raised that this would cause parking problems within the Mews blocking access to the ground floor west garage.
- 9.31. It is not considered that the loss of parking for 1 vehicle would result in a detrimental impact to parking demand in this area that could not be sufficiently controlled and managed by the existing CPZ. The site will retain adequate space internally for storage of bicycles on the ground floor.
- 9.32. Therefore the proposal is considered to be acceptable and in accordance with policies DM33 and DM36 of City Plan Part Two and CP9 of City Plan Part One.

Standard of Accommodation

- 9.33. The dwelling would offer 3 bedrooms to 5 persons over 3 storeys. The minimum gross internal floor space for a dwelling of this size would need to meet the minimum of 99msq. The proposal plans demonstrate it would be approximately 126msq. The section confirms that the standard of accommodation would meet the minimum internal head height of 2.3m.
- 9.34. The 3 bedrooms on the first floor would provide 2 double bedrooms, that meet the min. requirement of 11.5msq and 1 single room, that meet the min. requirement of 7.5msq and minimum width.
- 9.35. The internal alterations proposed would move the communal living area and kitchen to the second floor. The dwelling is in a poor condition and the new layout would offer a better standard of accommodation for the use of future occupiers and includes a modest recessed balcony providing some outdoor amenity space. The proposed plans include adequate ventilation and storage and washing facilities.

- 9.36. The proposal is considered to be in accordance with policy DM1 of City Plan Part Two and the NDSS (Nationally Described Space Standards).

Other matters

- 9.37. Party wall agreements are a private matter between landowners and do not form a material consideration in the determination of applications.
- 9.38. Concerns were raised that the drawings provided were inaccurate. The plans have been updated to clarify the materials in the dormer as it had originally stated conflicting materials to the window detail and a second rooflight to the proposed roof plan was missed.
- 9.39. Concerns were also raised that the new connection of rainwater goods has not been included on the proposed plans nor details of the new heating system. A condition is attached requiring details of rainwater goods, ventilation and position of any new flue from fitment of a new boiler are submitted to the LPA for approval prior to fitment.
- 9.40. Matters such as loss of property value, structural safety, and the impact of construction works are not material planning considerations.
- 9.41. A site visit has been undertaken to make an informed decision in addition to online mapping.

Conclusion

- 9.42. The proposed alterations are considered to result in less than substantial harm to the listed building and these alterations are balanced with a number of benefits to the appearance and historic character of the building resulting in a neutral and acceptable impact overall and the development would not cause harm to the character of the building or Conservation Area. Subject to the recommended conditions no harm is considered to result to neighbouring amenity nor would the proposal have a harmful impact on the Local Highways network or cause harm to biodiversity. The development is therefore considered to be in accordance with the Brighton and Hove City Plan Part One and Part Two.

10. EQUALITIES

- 10.1. Section 149(1) of the Equality Act 2010 provides:
- 1) A public authority must, in the exercise of its functions, have due regard to the need to—
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 10.2. Officers considered the information provided by the applicant, together with the responses from consultees and determined that the proposal would not give rise

to unacceptable material impact on individuals or identifiable groups with protected characteristics.

