

<u>No:</u>	BH2011/03432	<u>Ward:</u>	
<u>App Type:</u>	Full Planning		
<u>Address:</u>	Blocks E & F Kingsmere, London Road, Brighton		
<u>Proposal:</u>	Roof extension to Blocks E & F to provide 8no flats each with own private roof garden.		
<u>Officer:</u>	Steven Lewis	<u>Valid Date:</u>	28/11/2011
<u>Con Area:</u>	N/A	<u>Expiry Date:</u>	23 January 2012
<u>Listed Building Grade:</u>	N/A		
<u>Agent:</u>	Strutt and Parker, 31 North Street, Chichester		
<u>Applicant:</u>	Anstone Properties Ltd, c/o Strutt & Parker		

1 RECOMMENDATION

That the Committee has taken into consideration and agrees with the reasons for the recommendation set out below and the policies and guidance in section 7 of this report and resolves to be **MINDED TO GRANT** planning permission subject to the following:

- (i) The completion of a Section 106 obligation to secure the following:
 - A contribution of £6,000 towards sustainable transport improvements in the vicinity of the site.
- (ii) Regulatory Conditions:
 - 1) The development hereby permitted shall be commenced before the expiration of three years from the date of this permission.
Reason: To ensure that the Local Planning Authority retains the right to review unimplemented permissions.
 - 2) The development hereby permitted shall be carried out in accordance with the approved Andrew Borley RIBA drawings no.A1211/01 Rev B, A1211/02 Rev B, A1211/03 Rev B, A1211/04 Rev B, A1211/05 Rev B, A1211/06 Rev C, A1211/07 Rev B, A1211/08 Rev B & A1211/09 Rev B received on 11/11/2011.
Reason: For the avoidance of doubt and in the interests of proper planning.

Pre-Commencement Conditions:

- 3) No development shall take place until samples of the materials (including colour of render, paintwork and colourwash) 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. Development shall be carried out in accordance with the approved details.
Reason: To ensure a satisfactory appearance to the development and to comply with policy QD1 of the Brighton & Hove Local Plan.
- 4) No development shall take place until a scheme for the storage of refuse and recycling has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be carried out in full as approved prior to first occupation of the development and the refuse and recycling storage facilities shall thereafter be retained for use at all times.
Reason: To ensure the provision of satisfactory facilities for the storage of

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- refuse and to comply with policy QD27 of the Brighton & Hove Local Plan.
- 5) Unless otherwise agreed in writing by the Local Planning Authority, no residential development shall commence until:
- (a) evidence that the development is registered with an accreditation body under the Code for Sustainable Homes and a Design Stage/Interim Report showing that the development will achieve Code level 3 for all residential units have been submitted to the Local Planning Authority; and
 - (b) a Design Stage/Interim Code for Sustainable Homes Certificate demonstrating that the development will achieve Code level 3 for all residential units has been submitted to, and approved in writing by, the Local Planning Authority. A completed pre-assessment estimator will not be acceptable.

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

- 6) Notwithstanding the approved floor plans, the development hereby permitted shall not commence until revised floor plans incorporating lifetime home standards have been submitted and agreed in writing by the Local Planning Authority. The development shall be carried out in strict accordance with the agreed details and retained thereafter.

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

- 7) The development hereby permitted shall not be commenced until details of sustainability measures have been submitted to and approved in writing by the Local Planning Authority. These details shall demonstrate how the development would be efficient in the use of energy, water and materials in accordance with Supplementary Planning Document SPD08 Sustainable Building Design. The development shall be carried out in strict accordance with the approved details.

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

Pre-Occupation Conditions:

- 8) The development hereby permitted shall not be occupied until the cycle parking facilities shown on the approved plans have been fully implemented and made available for use. The stands inside the store are 'stand alone' e.g. Sheffield type stands and are proportionately distanced away from each other with the end stands 700cm away from the adjacent walls to ensure enough space for the central stands. The cycle parking facilities shall be secured, well signed and advertised to residents and visitors. Thereafter the facilities shall be retained for use by the occupants of, and visitors to, the development at all times.

Reason: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than private motor

- vehicles and to comply with policy TR14 of the Brighton & Hove Local Plan.
- 9) Unless otherwise agreed in writing by the Local Planning Authority, none of the residential units hereby approved shall be occupied until a Final/Post Construction Code Certificate issued by an accreditation body confirming that each residential unit built has achieved a Code for Sustainable Homes rating of Code level 3 has been submitted to, and approved in writing by, the Local Planning Authority.
- Reason:** To ensure that the development is sustainable and makes efficient use of energy, water and materials and to comply with policy SU2 of the Brighton & Hove Local Plan and Supplementary Planning Document SPD08 Sustainable Building Design.

Informatives:

1. The applicant is advised that new legislation on Site Waste Management Plans (SWMP) was introduced on 6 April 2008 in the form of Site Waste Management Plans Regulations 2008. As a result, it is now a legal requirement for all construction projects in England over £300,000 (3+ housing units (new build), 11+ housing units (conversion) or over 200sq m non-residential floorspace (new build)) to have a SWMP, with a more detailed plan required for projects over £500,000. Further details can be found on the following websites: www.netregs.gov.uk www.wrap.org.uk.
2. The applicant is advised that details of the Code for Sustainable Homes can be found on the Planning Portal (www.planningportal.gov.uk), on the Department for Communities and Local Government website (www.communities.gov.uk) and in Supplementary Planning Document SPD08 Sustainable Building Design, which can be accessed on the Brighton & Hove City Council website (www.brighton-hove.gov.uk). Accreditation bodies at March 2010 include BRE and STROMA; other bodies may become licensed in future.
3. This decision to grant Planning Permission has been taken:
 - (i) having regard to the policies and proposals in the Brighton & Hove Local Plan set out below, including Supplementary Planning Guidance and Supplementary Planning Documents:
(Please see section 7 of the report for the full list); and
 - (ii) for the following reasons:-

The proposed development would have a satisfactory appearance and would have no adverse impact on the character and visual amenity of the area. There would be no material detriment to the amenities of nearby residential occupiers and subject to planning conditions would provide an acceptable level of sustainability, transport measures, lifetime homes and refuse and recycling facilities. The development would be in accordance with the policies of the adopted local plan.

2 THE SITE

The application relates to a site on the eastern side of London Road known as Kingsmere: a residential development of four purpose built four-storey blocks

comprising 120 flats.

Blocks E & F are sited to the front of the Kingsmere estate, set back from the edge of London Road by the spacious formal front landscaping and are partially screened by mature trees. Blocks E&F are a joint building of four storeys comprising flats of a modern appearance, with set back sections, forward projecting bays and tile hanging clad top floor.

The surrounding area is predominantly flatted residential development within large sites with off-street surface parking. London Road is partly characterised by the presence of adjoining green space and established trees / vegetation. The site is surrounded to the south east and west by, but is not specifically located within, the Preston Park conservation area.

3 RELEVANT HISTORY

There have been numerous applications on the site for the original Kingsmere development, alterations to the buildings and works to trees which are subject to a preservation order. The following applications are most relevant to this application.

BH2011/01101: Additional storey to form 4no three bedroom flats with private roof gardens over Blocks A & B. Approved 07/07/2011

BH2010/02056: Permission was granted for an additional storey of living accommodation to create 4no. three bedroom penthouse flats with private gardens over blocks E & F.

BH2007/02691: Planning permission was refused in 2007 for 'roof extensions to blocks A & B and E & F to provide 8 penthouse flats and provision of 22 additional car spaces and new secure cycle store'. An appeal against this decision was dismissed (see Considerations in Section 7 below).

BH2007/00709: Planning permission was refused in April 2007 for 'roof extensions to blocks A + B & E + F to provide 8 penthouse flats, provision of 23 additional car spaces & a new secure cycle store'.

3/93/0501/OA: Planning permission was refused in 1993 for an additional storey on the roof of each of the existing 6 blocks in the form of a mansard roof to provide an additional 16 flats and an increase in parking to provide an additional 24 spaces.

73/325: Permission was granted in 1973 for the erection of 115 s/c flats in 3/4 storey blocks with service roads and car parking space for 120 cars.

4 THE APPLICATION

The application seeks consent for the construction of an additional storey to blocks E & F to create a total of additional eight flats comprising of 6 two bedroom units and 2, one bedroom units. The additional storey incorporates extensive full-height glazing and roof gardens enclosed by balustrades.

The proposal is a revision of the previously approved scheme (BH2010/02056) which permitted 4 three bedroom flats. The amendments are largely confined to internal alterations and would not result in an increase to the footprint of the additional storey, but would include some minor fenestration changes to the west elevation.

5 CONSULTATIONS

External

Neighbours: Seventeen (17) letters of representation have been received from **Flats 1, 4, 5 (x2), 6, 8, 18, 28, 41, 42, 43, 72, 76, 79, 100, Kingsmere, Kingsmere Residents Association (76 Signatories) and 1 Unaddressed objecting** to the application for the following reasons:

- The weight of the additional storey could damage the foundation and original structure, endangering lives of inhabitants. There are already some faults developing in the original structure. The estate is built on the alluvial soils over the chalk of the Newhaven bed formation. Foundations of the existing flats are in the form of conventional strip footings with cross wall construction for internal load bearing walls, the increase of structural load will promote additional settlement to the existing structure and exacerbate bricks dropping and structural damage.
- The construction would lead to noise and disturbance to existing residents from dust, noise, traffic and inoperability of the lifts
- The appearance of the additional storey and its height is unsuitable and will harm the character and appearance of the estate and wider area.
- The new flats will harm the amenities of existing occupiers from greater overlooking, loss of privacy, overshadowing and noise from people using gardens and an additional floor of accommodation above.
- There is insufficient cycle parking at present
- It is implied that entrance to the flats is level. This is incorrect as there are 3 steps, a drop in levels across the site and the suitability of the lift for disabled access is questionable.
- The proposal will place an additional burden upon demand for refuse and recycling facilities. No refuse facilities have been provided within the application, the refuse department have stated their intention to discontinue collection if present volumes are not decreased. Further waste would present a potential health hazard.
- The development would increase parking demand for spaces within the estate. At present there are 110/119 parking spaces with some being used for commercial parking. With the additional demand from this development and blocks A & B the demand would rise to a level that would exceed the capacity of the site.
- Access and exit from the existing access is difficult due to the heavy volume of traffic on London Road. This development would increase these problems and place an unnecessary burden upon the traffic flow of this route.
- The original planning permission was granted on the basis that the blocks of flats would not exceed the current four storeys.
- The application is based upon financial gain without consideration for residents of which many are elderly.
- The new flats may have an impact upon the value of existing flats, will affect mortgage, insurance and building management arrangements and costs
- The flats cannot meet Lifetime Homes standards, parking and access restrict these and the application fails to demonstrate these each criteria.
- Proper consultation has not taken place.
- The use of the top floor would prevent present residents from being given the chance to install solar panels.

Internal:

Environmental Health: It is noted that consultations with respect to similar applications for additional storey in this location have been provided in August 2010 and May 2011, when no objection was raised. On the basis of the same issues being considered there are No objections to the proposal.

Sustainable Transport:

Recommendation

Recommended approval with conditions to protect the interests of the public using the roads and footways.

Contributions narrative

To comply with the Brighton & Hove Local Plan 2005 policies TR1 and QD28 and the Council Interim Guidance on Developer Contributions approved by Cabinet on the 17th February 2011 the Applicant is expected to make a financial contribution of £6000 to help finance off-site highway improvement schemes such as installing REACT at Varndean Road (southbound) and Harrington Road (southbound) bus stops (if only one is possible, the priority would be Harrington Road) and/or pedestrian crossing facilities on the A23 or at the site entrance.

Cycle Parking provision

The proposed cycle parking is acceptable if the following are included in the submitted details/drawings requested in condition 1 below:

- The stands inside the store are 'stand alone' e.g. Sheffield type stands and are proportionately distanced away from each other with the end stands 700cm away from the adjacent walls to ensure enough space for the central stands.
- The store is secure with either a security coded lock or keys available to residents
- Appropriate directional and location signage erected/placed on site to ensure residents and visitors are aware of the cycle parking facility

Car Parking

The applicant proposes no additional parking on site. Therefore any parking generated by this proposal could occur on the highway when the existing car park is full. Planning Policy Guidance 13 (Transport) notes that when implementing policies on parking local authorities should not require developers to provide more [car parking] spaces than they themselves wish, unless in exceptional circumstances, which might include significant implications for highway safety. There appear to be no significant circumstances in the surrounding area that would be exacerbated by this proposal. It would therefore not be reasonable or supportable at an Appeal to make a recommendation for refusal based upon a lower level of car parking than could be permitted by the Council's standards in SPG4.

6 MATERIAL CONSIDERATIONS

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate

otherwise.”

The development plan is the Regional Spatial Strategy, The South East Plan (6 May 2009); East Sussex and Brighton & Hove Minerals Local Plan (1999); East Sussex and Brighton & Hove Waste Local Plan (February 2006); Brighton & Hove Local Plan (21 July 2005).

7 RELEVANT POLICIES & GUIDANCE

Planning Policy Statements (PPS):

PPS 1: Delivering Sustainable Development
PPS 3: Housing
PPS 22: Renewable Energy

Brighton & Hove Local Plan:

TR1 Development and the demand for travel
TR7 Safe Development
TR14 Cycle access and parking
TR18 Parking for people with a mobility related disability
TR19 Parking standards
SU2 Efficiency of development in the use of energy, water and materials
SU10 Noise nuisance
SU13 Minimisation and re-use of construction industry waste
QD1 Design - quality of development and design statements
QD2 Design - key principles for neighbourhoods
QD3 Design - efficient and effective use of sites
QD14 Extensions and alterations
QD16 Trees and hedgerows
QD27 Protection of amenity
QD28 Planning obligations
HO3 Dwelling type and size
HO4 Dwelling densities
HO5 Provision of private amenity space in residential development
HO7 Car free housing
HO13 Accessible housing and lifetime homes
HE6 Development within or affecting the setting of conservation areas

Supplementary Planning Guidance:

SPGBH4 Parking Standards

Supplementary Planning Documents:

SPD03 Construction & Demolition Waste
SPD06 Trees & Development Sites
SPD08 Sustainable Building Design

8 CONSIDERATIONS

The main issues in the determination of this application are the design of the proposal upon the character and appearance of the area, the planning history of the site, amenity issues, transport and highways issues, sustainability and living accommodation standards.

Planning history and principle of development

The Kingsmere estate was granted planning permission in January 1973 (ref 72/4136 & 73/325). Contrary to representations received, neither planning permission imposed a planning condition to restrict further floors of accommodation on the Kingsmere estate.

Planning permission was refused in December 2007 for roof extensions to blocks A & B and E & F to provide 8 penthouse flats and provision of 22 additional car spaces and new secure cycle store. This application was refused upon design grounds, harm to residential amenity and the unknown impact of the new parking facilities upon protected trees located on the site. The decision was subsequently appealed and was dismissed by the Planning Inspector, who upheld the Council's reasons for refusal on design and arboricultural grounds.

A planning application in 2010 with a differing design and scope to that of the 2007 proposal for an additional storey was approved by the Planning Committee in September of that year (BH2010/02056). That approval was for an additional storey upon blocks E & F. The design has been amended compared to the previous refusal, to present a predominantly glazed upper storey set back from the existing front, side and rear elevations rather than flush. That proposal did not provide any further parking spaces to avoid having any adverse impact on trees around the previously proposed car park.

Significant weight should be attached to the recent planning decisions to allow an additional storey upon blocks E&F and A&B of Kingsmere. There are differences between the previous approval and the proposal, most significantly the increase in the number of self contained units from four to eight. This application should consider these differences, specifically in relation to transport, living standards, amenity, sustainability and design.

In principle subject to meeting the applicable policies of the Local Plan and other material considerations, an additional storey in this location remains acceptable.

The previous decision to grant the additional storey was also taken in light of a case at The Priory located on London Road to the north of the application site, on the western side of the road opposite the junction with Carden Avenue (BH2009/00058). This application was similar to the previously approved and present scheme now under consideration in respect that it sought an additional storey of accommodation with a comparable design. That case was refused in September 2009 and subsequently allowed on appeal in April 2010. The design of the original building, the appearance of the immediate locality and provision of parking differs between the two cases. However, the applications are sufficiently similar with respect to a number of issues raised that weight should be afforded to the Inspector's decision upon the priory as a material consideration in determining this application.

Design:

Policy QD1 relates to design and the quality of new development. It confirms that all proposals for new buildings must demonstrate a high standard of design and make a positive contribution to the visual quality of the environment.

Policy QD2 relates to design and key principles for neighbourhoods. It confirms that new development should be designed to emphasise and enhance the positive qualities of the local neighbourhood, by taking into account the local characteristics of the area.

Policy QD3 relates to efficient and effective use of sites and confirms that new development will be required to make efficient and effective use of a site, including sites comprising derelict or vacant land and buildings.

HE6 relates to development within or affecting the setting of conservation area. The policy seeks that new development preserve or enhances the character and appearance of conservation areas.

It is noted that the design has some minor external differences to that approved recently on the same block. There are some minor fenestration changes upon the western elevation.

The additional storey by reason of its scale, height, materials, form, detailing and siting would remain acceptable and would provide a quality design in contrast to the existing building and would provide visual interest to the building. Furthermore, an additional height with an acceptable design is a more efficient and effective use of the site without compromising the intensity of development appropriate to the surrounding area. The additional height would not affect the setting of the Preston Park Conservation Area given it lies outside of the designated area, would be seen in the context of the modern Kingsmere estate and remains satisfactorily designed in relation to its surroundings.

The additional height of the extensions would be approximately 3m taking the building to an approximate total height of 14.6m, with an additional 0.4m protrusion to accommodate the lift motor rooms. The footprint of the extension remains the same as that previous approved and therefore the front and rear elevation of the extension are set back approximately 2m with some variation from the existing elevations and approximately 4m from the side elevation. This approach, combined with the use of glazing and set back sections for the rendered parts has been previous accepted on this site, whilst the changes related to the glazing pattern which despite the changes would continue to significantly reduce the visual impact of the additional height and articulate an acceptable form.

Despite the minor glazing pattern changes, the large exposure of glazing and simple pattern would maintain an acceptable modern contrast to the existing building and provide visual relief to the main building preserving the positive characteristics of the area. Samples of materials should be secured by planning conditions to ensure that a satisfactory finish to the development.

Amenity

Policy QD27 relates to protection of amenity and confirms that permission will not be granted where development 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.

The Kingsmere estate is characterised by modest sized block of flats set within a spacious communal formal grounds with attractive landscaping. The proposed extension would be entirely within the current footprint of an existing block of flats and as such the new extension will maintain an acceptable relationship with its surroundings. The blocks within Kingsmere estate are sufficiently spaced from one another as to avoid a harmful loss of privacy, loss of outlook, loss of light or cause overshadowing and overlooking or any adverse increase as a result of the additional height.

The additional concerns raised by neighbouring occupiers concerning potential additional noise, disturbance and inconvenience during the construction period have been noted. These matters do not fall within the remit of planning control. However, local residents may have recourse under Environmental Health legislation in relation to noise and disturbance outside normal working hours.

As such it is considered that the development would not cause a harmful level of noise, disturbance and environmental harm.

Members attention is drawn to the previous approval upon this site and the Appeal Decision on The Priory, where the Inspector found a similar development acceptable in amenity terms.

Transport

Policy TR1 confirms that development proposals should provide for the demand for travel they create and maximise the use of public transport, walking and cycling.

Policy TR14 confirms that all proposals for new development and change of use should provide facilities for cyclists in accordance with the parking guidance.

The site provides 119 car parking spaces and this is in line with the council's adopted parking standards. The Highway Authority is not aware of any safety capacity concerns relating to overspill on to the public highway. Furthermore they comment there are no significant adverse circumstances in the surrounding area that would be exacerbated by the proposal.

The comments from the Sustainable Transport Team are noted, in that the scheme would be acceptable subject to a sustainable transport contribution of £6,000. The applicant has confirmed their willingness to enter into a Legal Agreement for the total requested sum and a number of off-site highway improvement schemes within the local area have been identified. These include pedestrian crossing facilities on the A23, bus stop improvements or installing Real Time Information boards.

The applicant has provided details of a cycle parking, to include a covered timber cycle store with parking for up to 12 cycles. This cycle storage is in addition to the existing 25 spaces located on the Kingsmere Estate. The submitted details are acceptable, subject to ensuring that stands are individual and sufficiently spaced, the storage is lockable and made available to residents and well signed and advertised.

Living Accommodation Standards and Housing Issues

The proposal would provide eight flats capable of providing an acceptable standard of living for occupants. Whilst the previous proposal sought four, 3 bedroom flats all capable of family occupation, it is considered that the proposal would continue to meet a strategic housing need in the city. The quality of the accommodation would be acceptable in respect of the standards of living space, private amenity space and access.

Each of the proposed units would have access to its own private amenity space in the form of roof gardens. Each of the gardens would be separated by obscure glazed screen and provide an appropriate amount of private space. Each of the flats would have joint kitchens and living rooms, adequate sized bedrooms and bathroom. The floor space of each unit is below the amount expected of new affordable and/or social housing standards, but would meet an acceptable standard for market housing. Each would have appropriate facilities and would provide a comfortable standard of living for the occupiers.

Policy HO13 requires that applications demonstrate that wherever practicable, Lifetime Homes criteria should be incorporated into the scheme.

Whilst the Design and Access statement contends that the flats will meet Lifetime Homes Standards, it is considered in this case that it would be unlikely that all standards could be met in a building with existing access and other physical constraints. Given the layout and the design of the additional storey it is considered that a number of Lifetime Homes criteria could be incorporated into the scheme and a planning condition is therefore recommended to secure appropriate additional measures.

Sustainability

Any new residential development upon the site would need to conform to the requirements of SPD08 in respect of medium scale developments as conversions. In addition, and to conform to the requirements of policy SU2, any development must demonstrate that issues such as the use of materials and methods to minimise overall energy use have been incorporated into siting, layout and design.

The application has been accompanied by a sustainability checklist which details the sustainability features of the scheme. These include the use of solar hot water system, a reduction in CO2 emissions, smart metering, joining the considerate constructor's scheme, solar panels, refuse and recycling facilities and attaining BREEAM Very Good, or Code level 3 for Sustainable Homes.

Planning conditions should be imposed to secure this standard of sustainability. The planning statement also sets out a number of other criteria which can be met which goes beyond EcoHomes for refurbishment standards and a general sustainability measures condition may be added.

Policy SU13 seeks to minimise construction industry waste. SPD03 supports the objectives on this policy. However new legislation on Site Waste Management Plans (SWMP) was introduced on 6 April 2008 in the form of Site

Waste Management Plan Regulations 2008. This legislation sits within Section 54 of the Clean Neighbourhoods and Environment Act 2005. On that basis a condition to secure waste minimisation management is not necessary.

Other issues

A number of grounds for objection have been raised by local residents in relation to potential construction methods, subsidence, insurance, sewer capacity, utilities, insurance, maintenance, value of existing flats and their rateable value. However, these are not material planning considerations in this case.

All other matters raised by residents as highlighted in this report have been examined, and cannot be considered as part of an assessment of the planning merits of the proposal.

9 CONCLUSION

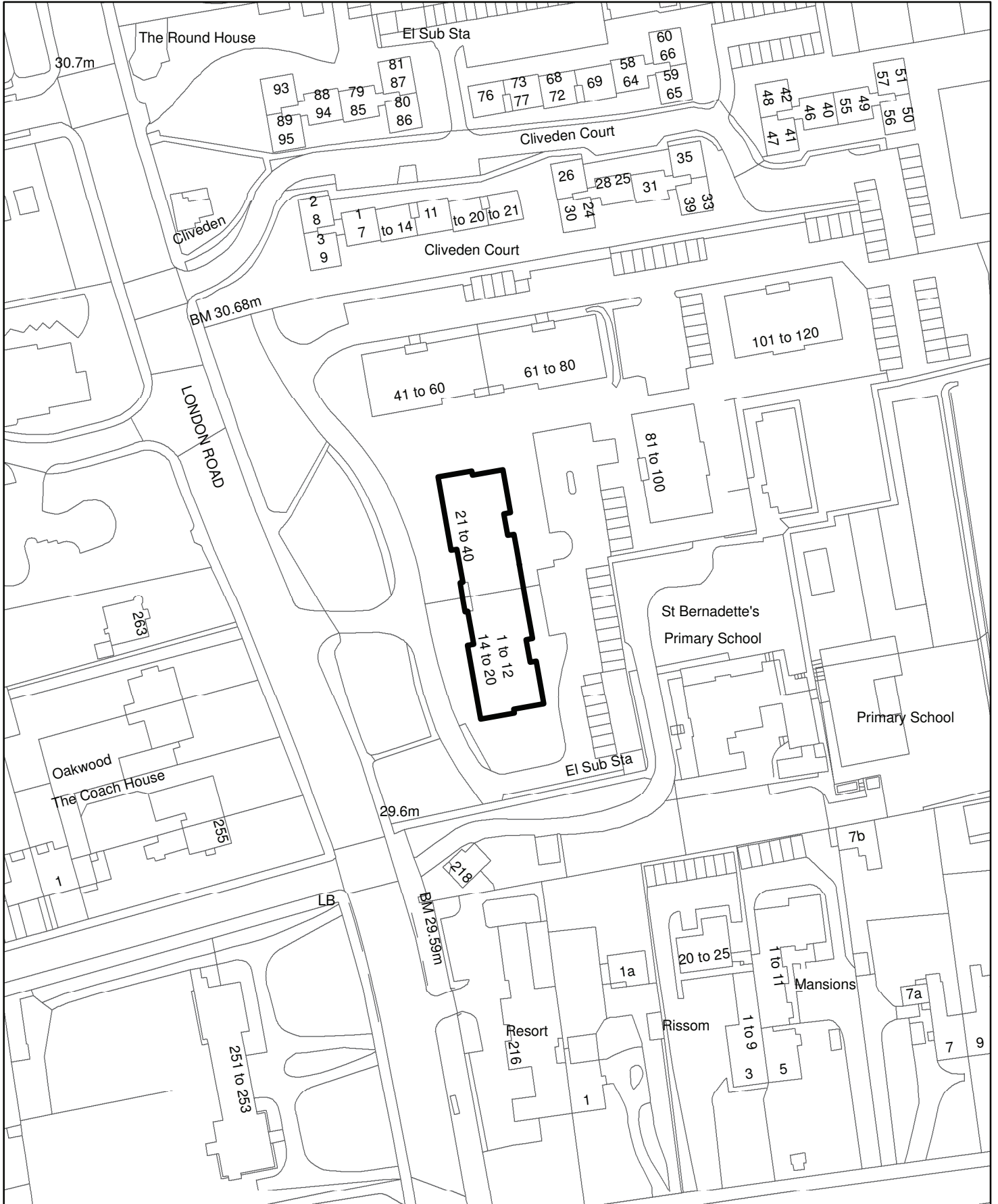
The proposed development would make an effective and efficient use of site, have a satisfactory appearance and would have an acceptable visual impact on the character and visual amenity of the area. The design includes provision of an acceptable standard of environmental sustainability, including on-site energy production.

The development would not result in harmful loss of light or outlook, or increased noise or disturbance, for occupiers of adjoining properties; and subject to an appropriate level of financial contribution to be spent on local transport infrastructure improvements and cycle parking it would not have a significant transport impact and travel demand would be catered for.

10 EQUALITIES IMPLICATIONS

The development should incorporate Lifetime Home standards wherever practicable into the design.

BH2011/03432 Blocks E & F Kingsmere, London Rd, Brighton.



**Brighton & Hove
City Council**



Scale: 1:1,250

