

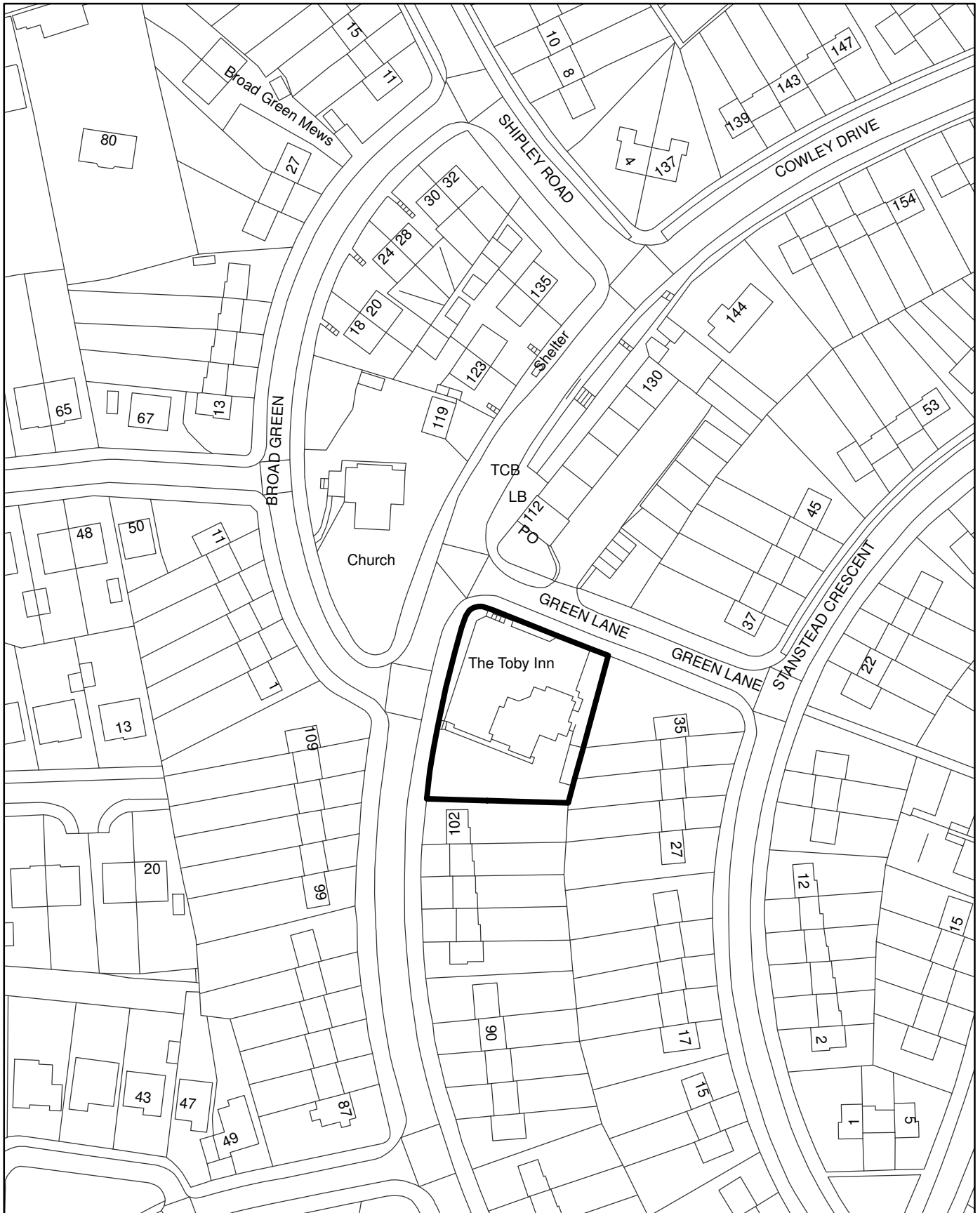
ITEM B

Toby Inn, 104 Cowley Drive, Brighton

BH2014/02105
Full planning

27 AUGUST 2014

BH2014/02105 Toby Inn, 104 Cowley Drive, Brighton.



N



**Brighton & Hove
City Council**

Scale: 1:1,250

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<u>No:</u>	BH2014/02105	<u>Ward:</u>	WOODINGDEAN
<u>App Type:</u>	Full Planning		
<u>Address:</u>	Toby Inn 104 Cowley Drive Brighton		
<u>Proposal:</u>	Extensions and alterations to existing building including additional floor to facilitate change of use from Public House (A4) to Hostel (Sui Generis).		
<u>Officer:</u>	Wayne Nee Tel 292132	<u>Valid Date:</u>	02 July 2014
<u>Con Area:</u>	N/A	<u>Expiry Date:</u>	27 August 2014
<u>Listed Building Grade:</u>	N/A		
<u>Agent:</u>	N/A		
<u>Applicant:</u>	Tim Martin Interiors Limited, Tim Martin, 17 Adelaide Crescent, Hove BN3 2JF		

1 RECOMMENDATION

- 1.1 That the Committee has taken into consideration and agrees with the reasons for the recommendation set out in section 11 and the policies and guidance in section 7 and resolves to be **MINDED TO GRANT** planning permission subject to a S106 Agreement and the Conditions and Informatives set out in section 11.

2 SITE LOCATION & DESCRIPTION

- 2.1 The site relates to an existing three storey public house located on the south east corner of Green Lane and Cowley Drive, Woodingdean. The public house has not been in full operational use for some period of time as it was originally closed in 2006. Since 2009 it has been opened for private functions and events only.

3 RELEVANT HISTORY

BH2014/00492 Extension and alterations to existing building including additional floor to facilitate change of use from Public House (A4) to Public House and Hostel (A4/Sui generis) – Refused 17/04/2014 for the following reasons:

- 1. The proposed development, by reason of its scale and design, represents an incongruous form of development that fails to improve the appearance of the site or the visual amenities of the area, contrary to policies QD1, QD2 & QD14 of the Brighton & Hove Local Plan.*
- 2. The proposed development, by reason of its scale and design, would result in a significant loss of amenity to adjacent properties at 31, 33 & 35 Stanstead Crescent by way of loss of privacy and oppression of outlook, contrary to policy QD27 of the Brighton & Hove Local Plan.*

BH2013/03082 Extension and alterations to existing building to facilitate change of use from Public House (A4) to Public House (A4) and Hotel (C1). Refused 08/01/2014.

BH2005/00940/FP- New entrance lobby plus insertion of door, decking and steps to rear. Approved 19/05/2005.

4 THE APPLICATION

- 4.1 Planning permission is sought for extensions and alterations to existing building including additional floor to facilitate change of use from Public House (A4) to Hostel (Sui Generis).
- 4.2 Following the previously refused planning application (BH2014/00492), the proposal now is for the loss of the existing A4 use and to convert the whole of the building into a Hostel use. The proposed roof alterations have also been redesigned.

5 PUBLICITY & CONSULTATIONS

External:

- 5.1 **Neighbours: Nine (9)** letters of representation have been received from **(31 Stanstead Crescent, 1 & 3 Broad Green, 42 Ainsworth Avenue, 3 Sycamore Close, 51 The Brow, 100 Greenways, 111 Cowley Drive, and one unknown address in Cowley Drive)** objecting to the application for the following reasons:

- Concerns over proposed hostel use;
- No community benefit to proposal;
- Overlooking towards neighbouring gardens;
- Increase in parked cars impacting on supply and safety;
- No kitchen or laundry facilities for occupants;
- Would be more appropriate for residential flats;
- Poor access for wheelchair users.

- 5.2 **Councillor Dee Simson** has objected to the application. Correspondence attached.

Internal:

5.3 Planning Policy:

The loss of the public house use on the site is acceptable, given the history of anti-social behaviour at the pub, the lack of viability of a public house use and the lack of interest from prospective tenants. This is in accordance with policies SA6 of the City Plan and HO20 of the Local Plan.

- 5.4 Further details should be provided and secured by condition, to safeguard the amenity of neighbouring residents and potential occupants, in accordance with policy QD27 of the Local Plan.
- 5.5 Given the significant demand for housing in the city, a C3 housing use for the site would be preferable to the proposed hostel use, which would only be suitable for short- to medium-term accommodation and for which there is not a demonstrable need in the city.

5.6 Environmental Health:

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The applicant should be aware that whilst a planning condition has not been placed, should complaints be received the Environmental Health Department will be required to investigate the matter further under statutory provisions.

5.7 **Sustainable Transport:** Support

Recommended approval as the Highway Authority has no objections to this application subject to the inclusion of conditions to secure on site cycle parking, disabled car parking and a Travel Plan. Also recommend a contribution under s.106.

5.8 The Highway Authority comments are similar to the two recent applications on this site.

6 **MATERIAL CONSIDERATIONS**

6.1 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."

6.2 The development plan is:

- Brighton & Hove Local Plan 2005 (saved policies post 2007);
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (Adopted February 2013);
- East Sussex and Brighton & Hove Minerals Local Plan (November 1999); Saved policies 3,4,32 and 36 – all outside of Brighton & Hove;
- East Sussex and Brighton & Hove Waste Local Plan (February 2006); Saved Policies WLP 7 and WLP8 only – site allocations at Sackville Coalyard and Hangleton Bottom and Hollingdean Depot.

6.3 The National Planning Policy Framework (NPPF) is a material consideration.

6.4 Due weight should be given to relevant policies in the development plan according to their degree of consistency with the NPPF.

6.5 The Brighton & Hove City Plan Part One (submission document) is an emerging development plan. The NPPF advises that weight may be given to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies to the policies in the NPPF.

6.6 All material considerations and any policy conflicts are identified in the "Considerations and Assessment" section of the report.

7 **RELEVANT POLICIES & GUIDANCE**

The National Planning Policy Framework (NPPF)

Brighton & Hove Local Plan:

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TR1	Development and the demand for travel
TR7	Safe development
TR14	Cycle access and parking
TR19	Parking standards
SU2	Efficiency of development in the use of energy, water and materials
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
QD4	Design – strategic impact
QD14	Extensions and alterations
QD15	Landscape design
QD27	Protection of Amenity
HO20	Retention of community facilities
SR14	New hotel and guest accommodation

Supplementary Planning Guidance:

SPGBH4 Parking Standards

Supplementary Planning Documents:

SPD03 Construction & Demolition Waste

SPD08 Sustainable Building Design

SPD12 Design guide for extensions and alterations

Brighton & Hove City Plan Part One (submission document)

SS1 Presumption in Favour of Sustainable Development

SA6 Sustainable Neighbourhoods

CP6 Visitor Accommodation

8 CONSIDERATIONS & ASSESSMENT

8.1 The main considerations in the determination of this application relate to the principle of the development, the impact of the proposed extensions and alterations on the appearance of the building and amenity of future and adjacent occupiers, and highway issues and sustainability matters.

Principle of Use:

8.2 The existing building comprises a ground floor public house with associated residential accommodation on the upper floor. The application proposes conversion of the existing public house use to form an 18 room hostel (sui generis use class).

Loss of existing public house use

8.3 A proposal involving the loss of a public house use, which is defined as a community use by the NPPF, must be considered having regard to policy HO20 of the Brighton & Hove Local Plan which states that:

8.4 *'Planning permission will not be granted for development proposals, including changes of use, that involve the loss of community facilities, including: hospitals,*

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health centres, surgeries/clinics, museums, art galleries, exhibition halls, places of worship, day care centres, libraries, schools, crèches, public toilets, church and community halls, theatres and cinemas.

8.5 *Exceptions may apply when:*

- a. the community use is incorporated, or replaced within a new development; or*
- b. the community use is relocated to a location which improves its accessibility to its users; or*
- c. existing nearby facilities are to be improved to accommodate the loss; or*
- d. it can be demonstrated that the site is not needed, not only for its existing use but also for other types of community use.*

Where an exception (a-d) applies, a priority will be attached to residential and mixed use schemes which may provide 'live work' and, or starter business units to meet identified local needs.'

- 8.6 A public house can serve an important community function and the loss of such a facility could be to the detriment of the community as a whole. This is reflected in policy SA6 (Sustainable Neighbourhoods) of the City Plan, where it is recognised that public houses within easy walking distance for local residents contribute to the achievement of sustainable neighbourhoods.
- 8.7 The applicant has asserted in the planning statement that the proposed loss of the public house complies with criteria d. The existing public house use has suffered from a poor local reputation in the past, with incidences of anti-social behaviour recorded at the site. The premises ceased operation as a pub in July 2006, and since 2009 has been used for events and functions. Evidence has been supplied (by McKoy's Pub Brokers Ltd) which demonstrates that the pub would not be able to be profitable, given previous performance. Further evidence (supplied by Paramount Investment & Development Brokerage) shows that the pub was marketed 'to let' for 3 years after 2006 with no tenants found, after which time the pub was marketed for sale as a development opportunity. Paramount has also supplied additional information which supports the claim that the pub is not a viable prospect.
- 8.8 The loss of a public house in this location is regrettable. The nearest alternative establishments are located roughly 1.5 miles away in Rottingdean or on Warren Road. However, it is clear from the evidence submitted that a pub in this location would struggle to be profitable and that there has been a lack of demand from potential tenants. The troubled history of the pub also suggests that this particular pub has historically not made a positive contribution to the community.
- 8.9 It is not clear to what extent alternative community uses have been explored by the applicant. It is recognised, however, that the building would likely require investment to fund alterations in order to be suitable for alternative community uses. It is also recognised that the history of the site may make the building unattractive for community uses. There are a number of other community buildings in Woodingdean, including three church buildings, one of which – St Patrick's RC church – lies opposite the application site.

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- 8.10 Therefore it is considered that the proposal would not be contrary to the objectives of policy HO20, City Plan Policy SA6 or the objectives set out in the NPPF in this case.

Proposed Hostel Use

- 8.11 The supporting information states that the hostel would form medium to long term temporary accommodation primarily for use by transient persons who may need accommodation whilst either temporarily working in the area or in between permanent accommodation elsewhere. The supporting document states that guests would be likely to stay for months rather than days and would be accommodated on a self-catering basis (albeit with limited facilities). The applicant has submitted an agreement that would be signed by future occupiers which refers to guests rather than tenants, and states that the occupants of the rooms are not meant for permanent accommodation. It is considered that the nature of the proposed use constitutes a *sui generis* use class hostel, as applied for, and this can be secured by condition for the avoidance of doubt in the event permission is granted.
- 8.12 To support this judgement, in an appeal relating to a similar proposal (Torbay Council v Sheddon Hall Hotel 2011) in which the Inspector found that the building in question had been subject to a change of use from a hotel to a hostel, a *sui generis* use (appeal ref. APP/X1165/C/11/2156090). Matters that the Inspector found material were whether the great majority of guests would best be described as “transient passengers”, the nature of services and facilities provided to guests, the periods of stay, personalisation of rooms, the regularity of payments and what this includes, the number of staff and the number of people accommodated in the rooms. This largely corresponds with the nature of the proposed use under this application.
- 8.13 Given the nature of the proposed accommodation, which is not directed at tourism, policy SR14 of the Brighton & Hove Local Plan and policy CP6 of the submission City Plan Part One are not considered applicable. There is not considered to be a particular requirement for this type of hostel use in the city, particularly in this non-central location which is a significant distance from the main public transport hubs in the city and major employment areas. The application should therefore be considered in light of the presumption in favour of sustainable development, as set out in the NPPF, which requires planning permission to be granted unless adverse impacts would outweigh the benefits. The acceptability of use is therefore dependant on the standard of accommodation to be provided and its impacts on the appearance of the building and amenities of adjacent occupiers.
- 8.14 In terms of accommodation, the 18 units would form double and twin studio rooms, as well as 2 no. ‘studios’ on the second floor which would have a living/kitchen room separate from the bedrooms. Each proposed room is generally of a good size with good access to natural light and outlook. The plans do not include shared communal space such as kitchens, and it appears that the rooms would include limited cooking/fridge/washing facilities. The size of the accommodation and its limited facilities for day-to-day living is considered appropriate for the temporary use proposed, however it would be unacceptable

as permanent living accommodation. Whilst the proposed use is for a hostel use, there are concerns that the building could be used in the future for long-term residential use. This concern is exacerbated by the addition of the two larger units of accommodation on the second floor. For these reasons, and for the avoidance of doubt, a condition can be attached in the event permission is granted to secure the use of the building as a sui generis hostel only.

Design and Appearance:

- 8.15 Local Plan policy QD3 seeks the more effective and efficient use of development sites. However, in seeking the more efficient use of sites, Local Plan policies QD2, and QD3 also seek to ensure that developments are not viewed in isolation and must be characteristic of their surroundings. Considerations of layout and design should be informed by the wider context having regard not just to neighbouring buildings, but to the townscape and landscape of the wider locality.
- 8.16 Policy QD14 relates to extensions and alterations and states that they will only be granted if the proposals are well sited, designed and detailed in relation to the host property.
- 8.17 As previous, the application proposes extensions to the existing property to enable the change of use to take place. A three storey side extension is proposed to the existing south-west corner of the building, whilst a single storey extension with hipped roof is proposed to the existing flat roofed section at first floor level. The existing pitched roof is now to be altered with additional pitches rather than the previously proposed bulky flat roofed top floor.
- 8.18 The proposed alterations now retain the modest pitched roof appearance, which sits more comfortably in its suburban context. The additional pitched roofs would result in the removal of the blocky flat roof frontage appearance. The proposed alterations to the window arrangement are considered appropriate and the proposed rooflights are considered acceptable.

Impact on Amenity:

- 8.19 Policy QD27 relates to amenity issues and confirms that permission will not be granted for proposals which cause material nuisance and loss of amenity to adjacent, existing or proposed occupiers.
- 8.20 The existing building sits in the rear corner of a plot on land that slopes steeply from west to east. As a result of this slope, the dwellings to the east fronting Stanstead Crescent are on significantly lower ground level to the building, with the building sitting within 4m of their rear boundaries. When viewed from the rear windows and gardens to properties on Stanstead Crescent, the building currently has a looming and oppressive presence, with direct overlooking from a first floor roof terrace and adjacent windows. The proposal would replace the terrace with an extension with no windows on the south-east elevation, and the removal of the existing first floor south-east elevation window. The extensions to the building on significantly higher ground level immediately rear of their rear boundaries would add to the dominance of the building to an extent. However the alterations would now not result in significantly more overlooking or overbearing presence than already exists for the most affected neighbouring properties.

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- 8.21 To the south, the building is separated from the nearest residential dwelling at 102 Cowley Drive by a minimum 10m across a communal garden. Although new studio windows are proposed in the south elevation of the building, this separation is sufficient to ensure that any overlooking would not be excessively harmful, and directed towards the rear of the garden to 102 Cowley Drive, rather than into rear windows.
- 8.22 Residents have objected to the hostel use and concerns how it would be managed and run. The hostel has the potential to cause amenity issues by way of potential noise disturbance due to the temporary nature of its occupation. However, there is no indication that this harm would be significant or otherwise reasonably controllable by way of the use of conditions. In the event disturbance occurs, this can be managed via separate legislation.

Sustainable Transport:

- 8.23 Brighton & Hove Local Plan policy TR1 requires new developments to address the travel demand arising from proposals. Policy TR7 requires that new development does not increase the danger to users of adjacent pavements, cycle routes and roads. Policy TR14 requires the provision of cycle parking with new development in accordance with the Council's minimum standard, as set out in BHSPG note 4. Policy TR19 requires development to accord with the Council's maximum car parking standards, as set out in BHSPGH note 4.
- 8.24 There is considered to be an increase in trip generation to and from the site as a result of these proposals, especially by persons travelling by motor vehicle from a wider catchment area. As such a contribution of £12,000 towards sustainable transport improvements in the area is sought by way of a s106 agreement to offset this increase, in accordance with policies TR1, TR7, TR19 of the Brighton & Hove Local Plan.
- 8.25 The proposed provision of 11 on-site car parking spaces is in line with current standards and the proposed level of car parking is deemed to be acceptable in this location. Full details of the disabled parking spaces can be secured by condition in the event permission is granted. Cycle parking is proposed however full details have not been provided. A condition can also be attached to secure appropriate details.

Sustainability:

- 8.26 Policy SU2 and SPD08 require medium scale development such as this to demonstrate an increase in net annual CO2 emissions, a reduction in water consumption, and minimisation of surface water run-off. No information has been submitted with the application however such matters can be addressed by condition in the event permission is granted.

9 CONCLUSION

- 9.1 The principle of the proposed development is considered acceptable in this case. The proposed external alterations would be of an appropriate appearance, no significant harm to future occupiers or neighbouring amenity

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would be caused, subject to compliance with conditions matters relating to transport and sustainability. Approval is therefore recommended.

10 EQUALITIES

None identified

11 PLANNING OBLIGATION / CONDITIONS / INFORMATIVES

11.1 S106 Heads of Terms

- Contribution of £16,000 towards sustainable transport improvements.

11.2 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 drawings listed below.
Reason: For the avoidance of doubt and in the interests of proper planning.

Plan Type	Reference	Version	Date Received
Existing ground floor plan	GSB.002		25 June 2014
Existing first floor plan	GSB.003		25 June 2014
Existing roof plan	GSB.004		25 June 2014
Existing basement plan	GSB.001		25 June 2014
Existing elevations	GSB.006		25 June 2014
Existing elevations	GSB.007		25 June 2014
Proposed elevations	GSB.012		25 June 2014
Proposed elevations	GSB.013		25 June 2014
Proposed elevations	GSB.014		25 June 2014
Proposed elevations	GSB.015		25 June 2014
Proposed block and location plan	GSB.016		25 June 2014
Proposed street scene flat roof	GSB.141		25 June 2014
Existing street scene	GSB.140		25 June 2014
Proposed basement	GSB.008		25 June 2014
Ground floor	GSB.009		25 June 2014
Proposed first floor	GSB.010		25 June 2014
Proposed roof plan	GSB.017		25 June 2014
Proposed second floor	GSB.020		25 June 2014
Site plan	n/a		25 June 2014

- 3) The development hereby permitted shall not be commenced until details of secure cycle parking facilities for the occupants of, and visitors to, the development hereby approved have been submitted to and approved in writing by the Local Planning Authority. These facilities shall be fully

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implemented and made available for use prior to the occupation of the development hereby permitted 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.

- 4) Within 3 months of occupation of the development hereby approved, the Developer or owner shall submit to the Local Planning Authority for approval in writing a detailed Travel Plan (a document that sets out a package of measures tailored to the needs of the site, which is aimed at promoting sustainable travel choices by residents, visitors, staff, deliveries and parking management) for the development. The Travel Plan shall include such commitments as are considered appropriate, and should include as a minimum the following initiatives and commitments:
- (i) Promote and enable increased use of walking, cycling, public transport use, car sharing, and car clubs as alternatives to sole car use:
 - (ii) A commitment to reduce carbon emissions associated with business and commuter travel:
 - (iii) Increase awareness of and improve road safety and personal security:
 - (iv) Undertake dialogue and consultation with adjacent/neighbouring tenants/businesses:
 - (v) Identify targets focussed on reductions in the level of business and commuter car use:
 - (vi) Identify a monitoring framework, which shall include a commitment to undertake an annual staff travel survey utilising iTrace Travel Plan monitoring software, for at least five years, or until such time as the targets identified in section (v) above are met, to enable the Travel Plan to be reviewed and updated as appropriate:
 - (vii) Following the annual staff survey, an annual review will be submitted to the Local Planning Authority to update on progress towards meeting targets:
 - (viii) Identify a nominated member of staff or post to act as Travel Plan Co-ordinator, and to become the individual contact for the Local Planning Authority relating to the Travel Plan.
 - (ix) Providing details of sustainable travel options to the site at the point of booking:
 - (x) Include details of bus, train and walking information to the site on the hotels website:
 - (xi) Provision of public transport, cycle maps and walking maps for the local area in the hotel's reception:

Reason: To ensure the promotion of sustainable forms of travel and comply with policies TR1 and TR4 of the Brighton & Hove Local Plan.

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- 5) No development shall commence until details of disabled car parking provision for the occupants of, and visitors to, the development hereby approved have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be fully implemented and made available for use prior to the first occupation of the development hereby permitted and shall thereafter be retained for use at all times.
Reason: To ensure the development provides for the needs of disabled staff and visitors to the site and to comply with Local Plan policy TR18 and SPG4.
- 6) Notwithstanding the submitted details, the development hereby permitted shall not be commenced until details of secure cycle parking facilities for the occupants of, and visitors to, the development hereby approved have been submitted to and approved in writing by the Local Planning Authority. These facilities shall be fully implemented and made available for use prior to the occupation of the development hereby permitted 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.
- 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 include an EST Home Energy Report, and how the development would reduce water consumption and minimise surface water run-off. 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.
- 8) The building shall only be used for temporary guest accommodation purposes in the manner of a hostel and for no other purpose.
Reason: To ensure the premises provides guest rather than permanent accommodation for future occupants, and to protect amenity for occupiers of adjoining properties and to comply with policies SR14 and QD27 of the Brighton & Hove Local Plan.

11.3 Informatives:

1. In accordance with the National Planning Policy Framework and Policy SS1 of the Brighton & Hove City Plan Part One (submission document) 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. This decision to grant Planning Permission has been taken:

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- (i) having regard to the policies and proposals in the National Planning Policy Framework and the Development Plan, 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 principle of the proposed development is considered acceptable in this case. The proposed external alterations would be of an appropriate appearance, no significant harm to future occupiers or neighbouring amenity would be caused, subject to compliance with conditions matters relating to transport and sustainability. Approval is therefore recommended.

From: Dee Simson
Sent: 04 August 2014 15:00
To: Wayne Nee
Cc: Jeanette Walsh
Subject: Application No: BH2014/02105
Importance: High

Re: Application No: BH2014/02105 Toby Inn Woodingdean

Dear Wayne

I am writing on behalf of residents living close to this site who have contacted me over the weekend complaining that they have not been given sufficient time for the consultation. This is for two reasons. The first being that papers were received almost two weeks after the initial consultation date and secondly that documents were unavailable on the Council's website for several days. In fact documents are still unavailable today as I, myself, tried to download the application form.

I am therefore requesting that I be allowed to object to this application on their behalf and am offered the same extension of time that has been offered to St. Patricks Church.

My reasons for objecting are as follows:

- 1) The loss of this site as an important community facility contrary to HO 20 of the Brighton & Hove Local Plan. This part of Woodingdean lost an important community facility when the pub closed and any development there should include this valuable amenity.
- 2) The application does not make it clear what the hostel will be used for.
- 3) There are insufficient kitchen/catering and laundering facilities for the number of units.
- 4) The proposed development, by reason of its scale and design, represents an incongruous form of development that fails to improve the appearance of the site or the visual amenities of the area, contrary to policies QD1, QD2 & QD14 of the Brighton & Hove Local Plan.
- 5) The proposed development, by reason of its scale and design, would result in a significant loss of amenity to adjacent properties at 31, 33 & 35 Stanstead Crescent by way of loss of privacy and oppression of outlook, contrary to policy QD27 of the Brighton & Hove Local Plan.

If you are minded to grant this application then I would ask that it is referred to the Planning Sub Committee for their final decision following a site visit and would request the opportunity to speak at that meeting.

Yours sincerely



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COUNCILLOR REPRESENTATION

Dee Simson