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Brighton Society Comments on Draft City Plan Part 2

Housing

DM1 Housing Quality, Choice and Mix

a The problem of changing needs as families grow should be addressed. How can new buildings on new housing developments be extended to cater for a growing family? Often people prefer to stay in the same house rather than uproot to a new neighbourhood or - given the costs of stamp duty and other expenses - can't afford to move in the first place.

b The extent of the problem needs to be seen in the context of the projected housing needs of:

1-bed:	14.4%
2-bed:	35.2%
3-bed:	34.2%
4+bed:	15.2%

(Source: G.L.Hearn OAN report June 2015)

Almost 50% of the city's housing requirement is for family homes of 3 - 4 bedrooms or more.

c What proportion of the new housing developments approved recently contribute to the 50% requirement referred to above for 3 or 4-bed houses? The lack of new homes being approved for new dwellings of those types is we suspect, the main problem which needs to be addressed for the C3 uses described in Policy DM1.

d para 2.11: Add: "small scale horticultural uses"

e para 2.13: Add: "external storage for bicycles, garden tools and furniture etc."

f **Monitoring procedure**

It is important to carry out monitoring of housing targets on a frequent and regular basis. Besides the annual targets for the various categories of housing (i.e private, affordable, size of units - 1-bed, 2-bed 3-bed etc.), the reviews should refer to the actual target, the planning approvals granted and the numbers of units built. Reviews should be carried out at six monthly intervals and the results posted on the Council website.

The review should also highlight the numbers of 'windfall' developments which were not specifically included in the official targets. Past experience has shown that the numbers of new dwellings resulting from windfall developments has consistently been considerably more than the numbers forecast, so it is important to monitor this.

There should be a procedure set out somewhere within the City Plan, by which actual planning approvals granted for the various types of housing described in the Housing, Accommodation and Community Topic can be monitored against the projected needs.

DM2 Retaining Housing and residential accommodation

- a para 2.17: *“Where it can be demonstrated that there has been a material change of use from a residential use e.g. to a holiday let, then this policy may be used for enforcement purposes. The intensification of such uses on a permanent basis can harm the residential amenity or character of the locality due to levels of activity that cause excessive noise and disturbance to residents.”*

AGREE, but change ‘may’ to ‘will’.

Also: It is unlikely the Council will achieve this aim, however. The private student rental sector along with other private lets will continue to affect residents’ quality of life and reduce choice as to where they would like to live due to the high number of homes being converted. The intensification of such uses on a permanent basis can harm the residential amenity or character of the locality due to levels of activity that cause excessive noise and disturbance to residents.

The amount of private rented properties in Brighton & Hove is 21% - twice as high as the national average, with a very high number of HMOs. (See Additional HMO licensing schemes on the Council's website)

The Council should lobby the government to change the policies on No Fault Evictions, Permitted Development Rights and Council Tax and Business Tax exemptions. The Council is losing millions of pounds with these exemptions.

For example if the number of HMOs is say about 2,500 and the average expected rates on such properties are say £1,600 p.a., the loss to the city would be £4M.

- b. para 2.17: It is estimated that another 2,500 properties are private rentals such as holiday flats and houses, party houses, Airbnb, Uber etc

Efforts should be made to ensure that a significant change of use such as a holiday let or AirBnB be made subject to a planning application or Article 4 direction throughout the city.

See also our comments under DM7 item c.

- c para 2.19: Could not the Council be more pro-active in discouraging second homes and holiday lets in the City to bring as many housing units as possible into full time use by local people?
- d Is there information on how many properties in the city are second homes and/or vacant? What is the Council’s Empty Property Service Plan and how does it work? It needs to be explained.

DM3 Residential conversions and the retention of smaller dwellings

- a para 2.21: see comments DM1 a, b, and f above.

DM4 Housing and Accommodation for Older Persons

- a Add to the list a) -g) the desirability of older people remaining within the same neighbourhood should they move to smaller or more specialised accommodation - (e.g. sheltered housing or care homes).

Older people also need to be located at or near ground floor levels.

These considerations imply that potential sites for such developments should be specifically identified on a neighbourhood basis, or a proportion of housing suitable for the elderly should be identified within larger housing developments within those neighbourhoods, in order to meet the need.

Given the 41% increase in the numbers of older people described in para 2.26, this is a critical housing requirement which needs to be set out more clearly than it is within the draft City Plan.

- b para 2.29: are there enough incentives within the City Plan to make it attractive to developers to provide housing for older persons? Why would they do that when they could probably make more money providing 2-bedroom flats on the upper levels of tall buildings for young professionals?
- c para 2.31:
 - what would the age restriction referred to in this paragraph be?
 - communal meeting lounge – this needs to be a requirement for clusters over a certain size – say more than 10 dwellings.

DM6 Build to Rent Housing

- a We support the build to rent sector as the present shorthold system does not always provide good quality property. We would suggest further measures to ensure that the present provision of private renting is regulated by licensing and other measures to ensure suitable and good quality housing for tenants for longer occupancy (eg as in Germany). Tenancy should be for a minimum of 3 years, not *at least* 3 years.
- b para 2 – although we agree that as much affordable housing as possible should form part of the contribution made by developers towards affordable housing, how relevant are these aims in the light of recently approved developments, particularly where the percentage of affordable housing has been allowed to drop from the 40% target set out in CP20 to below 15% or less?

Why should there be considerable differences in the proportion between one development and another? Construction costs and project costs must be comparable, so the cost of land must be the main variable. So a developer, knowing he can get away with less affordable housing than the 40% set out in CP20 could be tempted to offer more to secure the land, as a way around the viability process and evading his obligation to provide affordable housing.

The whole process is flawed and needs a re-think.

- c para 2.44 – open space. This is important. As the densities of housing and the additional people living within the city increases, the demands on public open space will become even more critical.

The existing parks in the city are already under severe pressure of demands for sport, recreation and exercise, and increasingly as a source of Council funding by accommodating major events. Yet funds for essential maintenance have been cut to the bone and the quality of our city parks is suffering as a result. More funding from Section 106 agreements and/or CIL funds is desperately required. This funding need needs to be recognised as an aim in the City Plan, beyond the basic requirement of CP16.

- d Management issues. Increasingly developers are claiming that they cannot find anyone to manage affordable housing where relatively small numbers of affordable dwellings are involved, and using commuted payments instead.

This process needs to be clarified, including details of how such funds are to be spent on providing the numbers of affordable dwellings the commitment to which the developer has avoided. This sum should include the additional market value of the extra units released by the relaxation of the obligation. Does it?

DM7 Houses in Multiple Occupation (HMOs)

- a In general we agree with this policy particularly with regard to the criteria and reasoned justification. Unfortunately, much damage has been done to areas of the city due to the proliferation of HMOs that has resulted in demographic changes which have affected for example, primary school numbers.

In Coldean, Moulsecomb, Bevendean, Coombe Road and St Bart's, entry numbers are so low that these schools are either in danger of closing or having their staffing levels halved. Some areas of the city suffer anti-social behaviour due to HMO student proliferation that includes noise, rubbish and litter. Some areas are becoming ghettos, and residents have gradually moved away.

- b para 2.61 states *"It is hoped that as the supply of Purpose Built Student Accommodation to meet the need from the city's educational establishments increases, the demand for HMOs from the student population will decrease."*

It is very unlikely that this will happen for as we know students prefer to leave campus (or PBSA) after one year. Perhaps conditions could be implemented that students in PBSA should stay for the three years while at University, bearing in mind the facilities provided. It is common for students to stay in PBSA for three years in some areas, such as York.

- c We suggest that the Local Authority lobby Government to change legislation with regard to private holiday lettings, party houses, and other lets such as AirBnB, as in effect they are HMOs. The Council believe that residents don't complain about noise issues, but they do. The problem is that as nothing is done to address residents' concerns, residents give up, or move away. There are some pockets in the city where there are streets containing so many holiday lets and AirBnB that the demographics are changing. This has the effect of the breaking down of communities which affects in particular older people who can't move away, and become very lonely. AirBnB are also buying properties in the city, so in effect they are landlords and should therefore be licensed.

DM8 Purpose Built student Accommodation

- a Adopted space standards outlined in DM1 should apply.
- b para 2.67 still mentions Pelham Street from CP21 which is no longer appropriate and should be removed. It implies that the Pelham Street properties are under consideration for student (PBSA) development.
- c para 2.68: *"to ensure that new PBSA developments cater for students who would otherwise be expected to reside in HMOs, tenancy agreements will be required by condition to cover a full academic year."*

We don't understand this sentence. Students are usually either going to live on campus or in a PBSA for their first year, so why have a condition to cover a full academic year. This paragraph should be reworded.

DM9 Community facilities:

No comments

DM10 Public Houses:

No comments

Design & Heritage

DM18 High quality design and places

- a Introductory section, page 62. *“Development proposals must demonstrate a high standard of design”. (a) local context and urban grain; (b) scale and shape of buildings; (c) materials and architectural detailing.”*

The emphasis in this topic on the relationship between proposed development and existing location is welcome, particularly in comparison with the city’s previous major planning statements on this subject. However, in terms of design and heritage, these priorities, which ought to be paramount throughout, are threatened by a number of factors not mentioned in the draft.

- a/a First, the impact of the tall buildings policy, which risks harm to the city’s heritage and landscape in terms of excessive height and consequential detrimental effects on views from key parts of the city, including those from heritage assets.

- a/b Secondly, the paucity of policy on all tall buildings in general - for example, the lack of proper Urban Design Frameworks and studies which would examine the context of sites for tall buildings, and the preferred design parameters within which tall buildings can be suitably designed in relation to and in sympathy with their surroundings.

Also we question the need for tall buildings – density is the important issue. See our comments on this issue in item DM19a below.

- a/c Thirdly, the impact of competing objectives in the national planning policy framework (NPPF), the legal weight of which is open to interpretation and whose duration appears to be indeterminate - for the time being.

in particular we are concerned about the the obligation the NPPF imposes on Local Authorities to balance public benefits and harm, and the likely detrimental effects of this on Heritage considerations, such as Conservation Areas and Listed Buildings.

- a/d Fourthly, we are concerned about the influence of external sources of design advice, for example the regional design panel, whose judgements could be said to reflect more typical international and national trends - rather than being based on local knowledge and appreciation of the existing urban context, the historical importance of much of the central area of the city, and the traditional patterns of development appropriate to the historic character of many areas of Brighton & Hove.

Too often we find that when we are consulted about a particular development the South East Design Panel has already set the parameters within which the developer has formulated his proposals and uses this to argue against any alternative suggestions that we make.

We are very concerned that the design process has been taken out of local hands and has been sub-contracted to Design South East which does not wholly represent the interests of persons living or working in the city. We would like to see this process

reversed and the interests of local residents made paramount, as they should according to the planning directions.

- a/e We would like to see the criteria which govern the principles set out in (a), (b) and (c) above, protected against such threats, and their importance relative to those threats clarified and stated within policy DM18.
- b para 2.136 - The opening statement of DM18 can only be tested against developments already completed in the last five years and those about to be started. The problem with terms such as sense of place, visual quality, attractive buildings and city; similar terms used in section four of City Plan 1, is that they are abstract and highly subjective. Therefore the reasoned justification 2.136 can only be seen as a marketing exercise – fine words, but will it have teeth? If the recent examples of Circus Street, Preston Barracks, and the Edward Street development are anything to go by, the answer has to be emphatically NO.
- c para 2.137 - It would be difficult to disagree with the aspirations in this section of DM18. *“The integration of new development into the local context is dependent upon an understanding of and positive response to existing development patterns of the local area if it is to be considered a success”*, is certainly welcome and confirms our views expressed in item a/d above.

However, local context and existing development patterns of local areas have been ignored in recent years; Anston House and the Preston Barracks development are two examples where some of the guidelines set out in DM18 have been completely disregarded.

Local context, *“As a rule of thumb ...”* Since this sentence refers to a substantial set of guidance preceding the sentence, it reads as an imprecise requirement, and could be worded more powerfully, especially as it is followed and offset by a lenient and loosely worded general qualification.

- d para 2.138 – see our comments on tall buildings in item a above and in item DM19a below. City Plan Part One Policy CP12 Urban Design and local guidance on tall buildings is now being ignored, with the proposed 18-storey Legal & General development in New England Road making a mockery of both CP12 and DM18.
- e para 2.140 - This seems to have been written for domestic scale buildings – such as references to gables and pitched roof. How appropriate is this guidance for most larger buildings which tend to be designed with flat roofs?

Not that we have anything against gables and pitched roofs! Some variation of roofscape design, or visual tapering on the top floors even on large buildings, could improve the quality of design and appearance of many of the recent new developments in the city.

The statement – *“what matters is not so much the absolute size of a new building or development, but its size relative to its surroundings, and how the apparent scale of a building or development will be”*.

This statement has been ignored by those involved in the planning and development of Anston House, Preston Barracks and the proposed 18-storey development in New England Road.

It needs to be reviewed and re-written to provide more comprehensive guidance. It will inevitably be quoted by designers as justification for their designs, and used by

planning officers and councillors as criteria for making important judgements on design matters.

Final sentence: *'highway'*. What is a highway in this context? Any road, and/or street? Any pavement by a road/street? Clarification is required

As it stands this paragraph is nowhere near good or comprehensive enough to provide adequate design guidance.

- f In general new buildings reflecting 'closely' existing buildings of consistent height are welcomed. The statement – "*where existing building heights are varied it is not essential to match existing levels exactly*". The resulting outcome of this statement could run counter to the idea of what constitutes 'local grain'.

An example of this mismatch in the urban environment is the recently constructed building, Vogue Studios/Stoneworks, which replaced a local pub on the Vogue roundabout. This building fails with to comply with DM18: 2.137, 2.140, 2.141, and 2.142.

The statement - "*on corner sites, for instance, such buildings can be used to give a strong sense of enclosure to the surrounding spaces and provide a landmark*". These so-called landmarks should therefore be of the highest design standards; they are markers in a city that reflect the attitudes towards how the city sees itself.

But the term "landmark" should not be abused; the Victorians used the device in corner situations very effectively often with octagonal turrets perhaps slightly higher than the existing roof line. But the mis-use of this policy statement by the developer of a tall building to locate a tower block on the corner of his building would be quite inappropriate. Cue the recently proposed 18-storey tower on New England Street.

The example of Vogue Studios/Stoneworks reflects badly on this city's attitude to place. Furthermore, the use of the phrase, *a strong sense of enclosure*, suggests a spatial containment created by inappropriate construction, therefore it should set off alarm bells whenever the phrase is used. The intentions expressed in this paragraph need to be clarified.

- g para 2.148 - streets – we agree with the intention of this paragraph, but why not go further and actively promote the return of streets wherever possible to the community as suggested by Prof. Stefan Lehmann of Portsmouth University in his inspiring talk to guests at the Growing Our Living City - Vision 2030 event in July this year.?
- h para 2.149 – (successful places) add the word 'sunlight' to the rather short and utilitarian list of elements which contribute towards the success of open spaces.
- i para 2.150 - Artistic element. This paragraph should make quite clear the difference between 'art' and 'graffiti'. Graffiti is unacceptable and epitomises social decline and promotes vandalism of our historic environment. Art does precisely the opposite.

For the topic of graffiti not to be mentioned at all in the Design and Heritage section is quite frankly negligent. It needs to be controlled and removed. Chichester did it. So could Brighton.

- j para 2.152 - "*design review service*" – We have previously questioned the meaning and relevance of this in item a/d above. Does it involve local knowledge and expertise? Does it include the Conservation Advisory Group which is never mentioned once?

DM19 Maximising Development Potential

- a para 2.154 – we consider the densities quoted are generally too low. In most recent planning approvals for large scale developments the densities achieved have been far higher.

We have proved in our own design studies - for example on Anston House - see <http://www.brighton-society.org.uk/tall-buildings-debate/> - that high densities can be achieved with low-rise solutions approaching 400 dwellings per hectare (dpu).

Elsewhere in the city – for example on the fringe sites - much greater numbers of dwellings than set out in the City Plan could be achieved by merely raising the figure of 50 dpu to 55 dpu.

As an aside this would be a much more effective way of increasing the number of dwellings in the city than by permitting more tall buildings. For example a typical tall building – say one of the three towers in the Anston House scheme – would have three flats per floor. So five storeys would have fifteen flats – the difference between a 10 storey building and a fifteen storey building.

So let's assume that 20 fifteen storey buildings are built between now and 2030. If they were only 10 storeys this would result in 225 fewer flats. This is a drop in the ocean compared with the figure of 13,200 new dwellings required in the city – about 1.7% of the total.

Tall buildings are not necessary – increasing the figure of 50dpu to 55 would provide far more houses – of the type actually required – family houses, rather than a relatively small number of small expensive flats on the upper floors of tall buildings.

DM20 Protection of Amenity

- a “Planning permission for **any** developmentwill be granted...” Surely not **ANY**? This word should be deleted.
- b para 2.156 – NPPF uses the word “harm” Should not this word also be included in the list of things to be considered by applicants?

Protection of Amenity - page 68: 2.156 - 2.157 When applicants for major, significant or ambitious development publicly present pre-application plans and outline designs, enabling local residents and other relevant interests to comment and discuss openly and directly with them, the results of the consultations need to reflect accurately the proximity or immediacy of those affected, the depth and strength of feeling or opinion voiced or recorded, and the seriousness and preponderance of those views.

The recent public consultation by First Base on the Edward Street development was a travesty. It must never happen again and the way this policy is expressed is important to ensure that.

- c para 2.157 – consultation with neighbours is not often done and invariably leads to conflicts between neighbours. Confirmation of consultation with neighbours should be a requirement accompanying all planning applications and a report on those consultations (including on any subsequent amendments), and the outcome of those consultations should be a requirement accompanying **any** planning application. This could actually save officer time by reducing the likelihood of potential conflicts.

- d paras 2.160 and 2.161 – Overshadowing and Sunlight and Daylight - fine words, but in the light of the planning approval given to the First Base development on the former Amex site, it would appear to have no teeth, and accordingly these policies are meaningless.

DM22 Landscape Design and Trees

- a 3rd para (p.72) - what is meant by “national importance”? Is this a reference to anything in the NPPF?
- b para 2.167 – first line should be “is” not “are”.
- c para 2.169 – add “traditional” species of tree, not just “native”. Many of our trees in urban spaces are not native, but are nevertheless well known and well established and can add greatly to the quality of our green spaces.
- d In the case of existing and potential green spaces, including public land, whose basis and essence are *grass*, consideration should be given to the risks of over-exploitation by temporary functions, events and structures which damage the endurance, health, appeal and amenity of the grass. See also our comments on Policy DM30 – Registered Parks and Gardens.
- e There may be a general argument, as laid down here, in favour of the policy that where or when a large tree is felled, it will be replaced by new younger trees of a number to compensate in terms of volume. However, must this rule be applied in all situations, as suggested here? Might there not be exceptional cases in which an important tree is replaced by an individual of the same or similar large species, with compensation for protracted loss of volume diverted into commensurate multiple planting at a location or locations in reasonable proximity?

DM23 Shop Fronts

- a We generally support these policies. But in relation to the Introduction, p.76, first paragraph: Advice to decorate those that are boarded up. This advice would benefit from more detail as to the meaning and nature of ‘decoration’. Not graffiti surely?

DM24 Advertisements

- a Relationship between advertisements and graffiti – if graffiti is signed, is it an advertisement? It would then need to have planning approval. That would be interesting. Though whether Planning Enforcement would ever get around to addressing the question is open to doubt.
- b Should there not be a statement on the relevance or otherwise of graffiti in this policy?

DM25 Communications Infrastructure

- a para 2.191 – we strongly support this policy, though should there not be a reference in this item to the subjection of these cabinets to art, advertising, decoration, graffiti and visual abuse? Or a cross-reference to the topic in which public art and graffiti is considered?

DM26 Conservation Areas

- a para 1 – the phrasing of this paragraph seems to indicate a presumption in favour of permission. We think the word “only” should be inserted (2nd line) between the words “will” and “be”, so it reads: Development proposals within conservation areas..... will **only** be permitted.....
- b DM26 should also make it clear that that applications will not be permitted where they would be detrimental or cause harm to the character of the Conservation Area.

- c item b – include the term “important architectural references” to the list of relevant criteria.
- d item j – things like paving, kerbing, landscape elements and lamp posts should be specifically referred to and included in this item.
- e para 2.195. This must be re-written to insist that in all cases a Heritage Statement is to be submitted with all planning applications in conservation areas together with contextual information to show how the existing streetscape is affected by a particular proposal.
- f Suggested replacement paragraph: *“In all cases a heritage statement must be submitted to describe the significance of any heritage assets affected and where there is no adopted character statement for the area, the applicant will be **required** to carry out an appraisal of the area and submit this in addition to the heritage statement. This appraisal should be proportionate to the scope of the proposal.”*

Note the word “required” – NOT just “to be expected” as it is currently expressed in para 2.195

- g Para 189 of the NPPF states that: *“In determining applications, local planning authorities should **require..** (our emphasis) ... an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*

Policy DM26 should at least be consistent with this and at best improve on it to reflect the importance of conservation of heritage assets bestowed on the city by its 34 Conservation Areas.

- h Para 2.195 should not just apply where there is no up to date Character Statement in place, particularly as many Character Statements need to updated and revised in the light of current situations.

How is the the term *“no up to date character statement in place”* to be interpreted? It could be said that many of them need to be updated anyway.

- i We would also comment that recent Character Statements such as those for the Old Town and Queen’s Park have set new, much higher standards than those character statements which were written say twenty years ago.
- j As a member of the Conservation Advisory Group (CAG), we see several planning applications which do include contextual information or a Heritage Statement. But some do not and this often makes it hard to evaluate, on the basis of the information submitted, how well or badly the character of the Conservation Area might be affected by the application.
- k It is noticeable that the applications where this information is not provided tend to be the worst in terms of quality of design as well as presentation.

- l para 2.196 – add (last line),”when considering planning applications and” through enforcement.....
- m para 2.199 *“The council will support the removal of buildings that have been identified in a character statement as harming the conservation area”*. Is there a case for extending this to say ‘the removal or transformation of buildings’?
- n generally - Should there not be some discussion and guidance about the priorities and definitions set out in the NPPF in terms of “harm” and the relative values in terms of balancing “harm” to conservation assets as against perceived “benefits” in terms of matters such as housing or jobs etc. In other words, at what level does conservation stand in the list of “benefits”? Above public benefits such as jobs and housing targets, or below? Both are “material considerations, but are they of equal value?

DM27 Listed Buildings

- a para 1 – the phrasing of this paragraph seems to indicate a presumption in favour of permission. We think the word “only” should be inserted (2nd line) between the words “will” and “be”, so it reads: Proposals involving the extension, alteration or change of use of a listed building..... will **only** be permitted.....
- b para 2.207 – this needs to be qualified to ensure that any changes must ensure that existing historical and architectural features are preserved.

DM30 Registered Parks and Gardens

- a We consider that temporary events should be precisely that. Where they exceed 6 weeks they begin to have a detrimental effect on the Park or Garden. The word “temporary” should be qualified to mean a maximum period of six weeks from beginning to end of the temporary use.
- b In addition, a statement setting out what investigations have been carried out on the feasibility of using alternative sites and locations for temporary events, must be carried out and included as part of a planning application for a temporary event prior to that application being lodged.
- c See also our comment on DM22 above

DM32 – The Royal Pavilion Estate

- a Comments as for DM30.

Cont’d

Section 3

Special Area Policy, Strategic Site Allocations, Housing and Mixed use Sites and Other Site Allocations

- a Further clarity is required for **Sections SSA5 Madeira Terrace** and **SSA6 Former Peter Pans Playground** where reference is made to potential developments on the beach. SSA5 has an aim of restricting construction to small hard standings for toilets etc, whereas SSA6 has an aim for creating all year round recreation attractions.

We would recommend that SSA5 is restricted to comments on Madeira Terrace alone and SSA6 is retitled to include all the beach areas to the south of Madeira Drive. SSA6 will also need to include the implications of the lease on the beach area having been agreed with SEA LANES.

It should be specified that any further developments on the beach should be categorised as temporary - there should be an aim to ensure that the south side of Madeira Terrace does not become a continuous built up area of the seafront which would remove any views of the sea.

SSA5 includes an aim to improve the connection between Marine Parade and Madeira Drive but does not mention the long term future of the lift. There should be a commitment to maintain the lift and provide a convenient and quick connection for pedestrians. Currently the signage and lighting is poor so an improvement for these facilities should also be included.

- b **46 to 54 Old London Road, Patcham**

We consider that this site which currently accommodates 5 family homes is too small for 30 houses or flats and will be unsuitable in this area of Patcham. In particular the scale and density of housing will be detrimental to the village look and feel, the existing character created by the well established tree planting, and thereby materially detract from the character and appearance of the area.

It would be far better to increase the density of developments on the fringe sites slightly in order to replace this relatively small number of new dwellings, as we suggested in para **DM19a** above.

- c **H3 Purpose Built Student Accommodation.** There should be an additional aim for the design of the development to be sympathetic to the surrounding area. There are a number of buildings adjacent to the specified sites that are on the Local List of Heritage Assets.