

## 10.0 PLANNING POLICY CONSIDERATIONS

10.1 The main issues to consider in determining the application are:

- The principle of development
- Visual/Heritage Impact
- Quality of Proposed Accommodation
- Neighbour Impact
- Highways
- Sustainability

### Principle of Development

10.2 The application results in the loss of Class D1 floor space. The lead policy on this point is HO20 from the Local Plan, though the weight that can be attached to this policy is lessened by the fact that a) the Council cannot demonstrate a five year supply of housing land, and b) that more up to date reasoning on the loss of community space can be found at paragraph 70 of the National Planning Policy Framework.

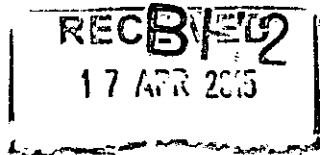
10.3 With regard to policy HO20, regard has to be paid to the fact that the premises are actively marketed by the current owners, but usage of the community facility remains very low. The Church was last "actively" used approximately 9 years ago. Since then usage has only been on an ad hoc basis. There is a sign board clearly displayed on the premises with the telephone number for booking the Church, but for 2014/15 there have been just few bookings, whilst for the last 5 years, the Church has been rented only three times per year. The most recent letting are set out below:

### 2014

#### Rox School of Dancing

January 13<sup>th</sup> to January 22<sup>nd</sup>      20 hours

Hired to them while damage to their own studio being repaired



15 ' 0 1 4 19

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Pretty Villain Theatre group

April 29th Rehearsals start (4)

3<sup>rd</sup> to 17<sup>th</sup> May Performances (11)

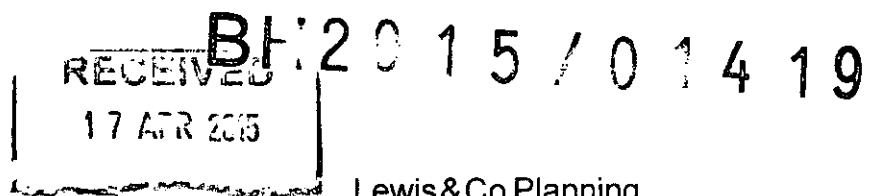
October 18<sup>th</sup> Tango group

2015

None

Such low uptake is simply not a reasonable use of a building when the City is facing immense pressure to satisfy its Need for Housing. Ultimately the low uptake shows that the site is not needed for community use and so its loss is acceptable with regard to Local Plan policy HO20. Policy HO20 places a preference on housing as an alternative use for community buildings.

- 10.4 If the Council takes a contrary view with regard to policy HO20, then it must have regard to its housing supply position and how this impacts on the presumption in favour of sustainable development. Where councils cannot demonstrate and up to date five year supply of housing (as is the case with Brighton and Hove City Council) then local plan policies that restrict the supply of housing must be considered out of date (see paragraph 49 of the National Planning Policy Framework). Under such circumstances the loss of the community facility needs to be considered with regard to the National Planning Policy Framework paragraph 70.
- 10.5 Paragraph 70 of the National Planning Policy Framework permits the loss of community facilities where their loss will not compromise the community's ability to carry out its day to day needs. Given that the facility is barely used by the local community, it is clear that this policy criterion is met.



### **Visual and Heritage Impact**

- 10.6 As confirmed in the earlier in this Statement, the proposed alterations are unobtrusive and respectful of both the host building and the conservation area. Consequently the development accords with the Councils' design and heritage policies: QD1 to QD4, HE6 (conservation areas) and HE10 (local listed buildings).

### **Quality of Proposed Accommodation**

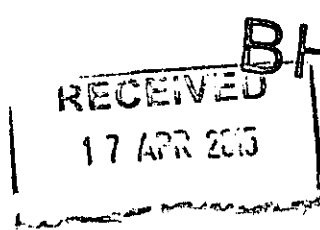
- 10.7 The development will provide for very high quality flats. The two top floor 1-bed flats will measure 57 and 64 m<sup>2</sup> (as against an emerging Government target of 50m<sup>2</sup>), whilst the two-bed units will measure between 83m<sup>2</sup> and 108m<sup>2</sup> (as against emerging government targets of 70m<sup>2</sup>). Consequently it can be seen that a very high standard of accommodation will be achieved.
- 10.8 Shared amenity space is provided throughout the site in accordance with Local Plan policy HO5.

### **Neighbour Impact**

- 10.9 The only new windows will be at roof level – these are too high to result in overlong of any neighbouring gardens.
- 10.10 Consequently it can be seen that the development will preserve the amenities of neighbouring residents in accordance with Local Plan policy QD27.

### **Highways Matters**

- 10.11 Please see the Reeves Transport Planning Statement that has been submitted with the application documents.

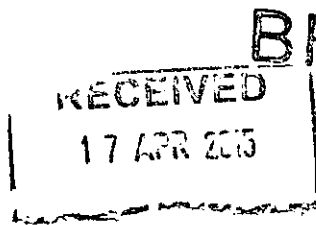


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### **Sustainability**

- 10.12 The scheme is inherently sustainable as it involves the re-use of an existing building located in a highly sustainable area – with good access to public transport and local shopping facilities.
- 10.13 With regard to the criteria set out under policy SU2:
- a) *measures to reduce fuel use and green house emissions*
- 10.14 The scheme will exceed latest Building regulations standards with regard to insulation.
- 10.15 All habitable rooms will benefit from natural ventilation and illumination.
- b) *Incorporation of renewable energy features*
- 10.16 Photovoltaic cells are not considered appropriate on the host building.
- c) *Measures to reduce water consumption*
- 10.17 Bathrooms will have showers incorporated within them, and all toilets will be dual flush units.
- d) *Re-use of rain water and grey water*
- 10.18 Rainwater butts will be fitted to allow for the irrigation of the garden and planted areas.



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*e) Use of material/methods to minimise overall energy /raw material inputs*

- 10.19 The scheme involves the re-use of an existing building in order to minimise construction industry waste
- 10.20 The scheme has been designed to high environmental standards and so complies with policy SU2 of the Local Plan.

## **11.0 CONCLUSIONS**

- 11.1 The application will ensure the active use of a "non designated" heritage building that makes a positive contribution to the character and appearance of the conservation area.
- 11.2 The loss of the community facility is acceptable with regard to local and national policy. As the facility is rarely used its loss will not compromise the local community's ability to meet its day to day needs.
- 11.3 The conversion works are sensitively designed and preserve the appearance of the host building.
- 11.4 The proposed flats are generously proportioned and will provide a high standard of accommodation for future occupiers.
- 11.5 For the reasons set out above, the Local Planning Authority is respectfully requested to grant planning permission.