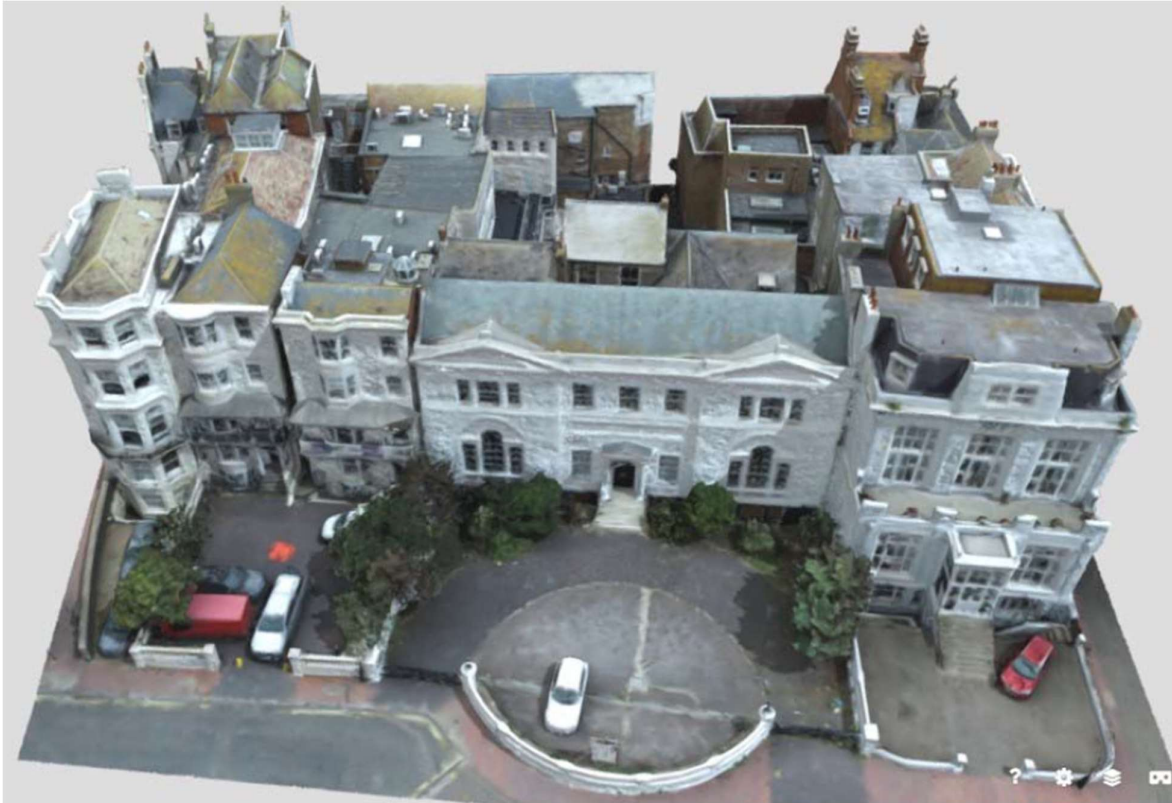


Planning Statement

SITE ADDRESS: 52-53 OLD STEINE, BRIGHTON, BN1 1NH



APPLICATION TYPE: FULL PLANNING PERMISSION AND LISTED BUILDING CONSENT

ON BEHALF OF: JENSCO GROUP

MARCH 2024



RTPI

mediation of space · making of place

Client: Jenco Group

Site Location: 52-53 Old Steine, Brighton, BN1 1NH

Job History:

| Version | Date | Author | Checked | Notes |
|----------------|-------------|---------------|----------------|-----------------|
| Draft | 15.02.2024 | ZD | | |
| Draft v2 | 07.03.2024 | ZD | LC | |
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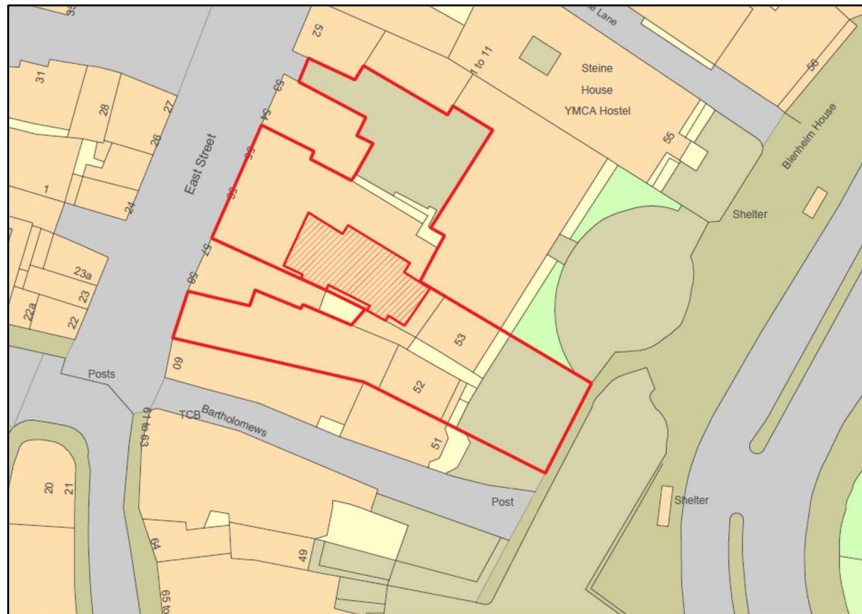
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1.0 INTRODUCTION

- 1.1 This statement is submitted on behalf of Jensco Group in support of the application for planning permission and listed building consent for the material change of use of 52-53 Old Steine, Brighton, from Class E(g)(i) office use, to a Sui Generis, student accommodation use with the use of seven rooms as self-contained holiday lets for a maximum of 14 weeks per year. This includes the construction of an additional storey above part of the building at 53 Old Steine alongside other associated works.
- 1.2 The application site is Grade II Listed. The proposed development will provide 39 student rooms and communal areas totalling 152.5sqm.
- 1.3 The proposal has been subject to pre-application advice, reference PRE2023/00149. The pre-application proposal was for the extension of the building, and the change of use of 52-53 Old Steine from offices to a flexible use comprising student flats and holiday accommodation. The advice stated that the development was acceptable in principle.
- 1.4 The application is supported by this statement and the following documentation:
- Application Forms
 - Ownership Certificates
 - Design, Access and Heritage Statement – February 2024
 - Marketing Report – 1st February 2024
 - Management Statement – January 2024 – v5
 - Verified Views Report – December 2023 – Revision B
 - Services Layout – 2307-TEW-ZZ-00-DR-ME-1500-S0-P01
 - Floor Plans and Elevations by EDWS Architects
 - Energy/Sustainability Statement – 2307-TEW-ZZ-RP-ME-Energy Report -SO-P03

2.0 APPLICATION SITE AND PLANNING HISTORY

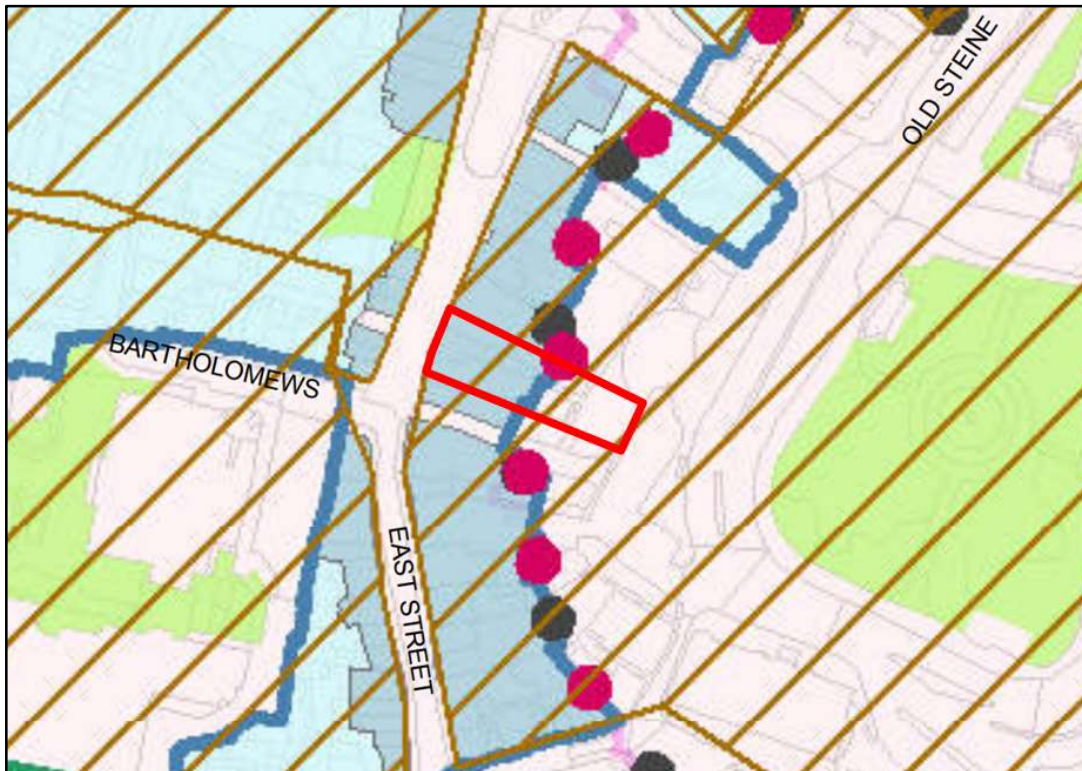
- 2.1 The site comprises two cojoined buildings between the Old Steine and East Street in Brighton City Centre.



Above: Site Location Plan

- 2.2 52-53 Old Steine are 4-5 storeys in height, including a lower ground floor level fronting Old Steine. The upper floors, from the second floor upwards, extend above the retail units on East Street. The East Street properties will be unaffected by the proposal and do not form part of the application.
- 2.3 The existing accesses to the building will be retained, and the internal layout will be amended to accommodate the change of use. The extension to the building is sited centrally within the submitted application site, and is not visible from the public realm. The extension is sited above a modern element of the building, with less historic or architectural significance than other elements of the building.
- 2.4 52 and 53 Old Steine are grade II Listed. The list reference for No. 52 is 1380668, and the list reference for No. 53 is 1380669. A separate Heritage Statement is submitted with this application.

- 2.5 The eastern part of the site is within the Valley Gardens Conservation Area, and the whole site is within an archaeological notification area. The western side of the site is also designated as being in Central Brighton, Prime Retail Frontage and the Regional Shopping Centre. Note the ground and first floors on the western side of the site do not form part of the application.



Above: Extract from the City Plan Policies Map, with the approximate site boundary outlined in red.

- 2.6 The location of the site in the city centre is ideal for student accommodation. The location is highly sustainable, and students would benefit from the excellent sustainable transport connections on the Old Steine, connecting to the A270/Lewes Road where Brighton and Sussex Universities are located.

Planning History

- 2.7 The site benefits from existing planning and listed building consent for the part change of use of 52-52 Old Steine from offices to student accommodation, creating 26 student rooms

with associated communal areas. This was approved under references BH2023/00018 and BH2023/00019.

2.8 Following the determination of these applications, the applicant is looking to make enhancements and improvements to better the original proposal. This includes a number of significant upgrades to the design and property, which we believe will be welcomed by the Council. These are:

- Upgrading of cluster bedroom arrangements into self-contained studios, and the provision of a large communal, social space.
- Improved internal layouts to aid circulation.
- The re-development of an under-utilised flat roof area, to create six additional studio rooms.
- The creation of a large social area including private dining, games and entertainment space.
- Dedicated laundry room, and parcel storage room.
- Reception area and associated staff welfare facilities.
- Cycle parking for students.
- Passive provision for staff parking, including EV charging points.
- Refuse storage and collection points.

2.9 Pre-application advice was sought for the development proposal at hand, which was issued by the Council on the 19th October 2023. The response received covered points from the Council's Planning Team, and full heritage advice comments. The key points from the feedback included:

- The principle of development is acceptable, if supported by an updated marketing report.
- The use of 8 studios for holiday-lets makes a better use of the property over the summer break. Such a use is appropriate as it contributes towards the visitor economy, in a central location.
- The Case Officer confirmed that the use of 8 studios for holiday accommodation is ancillary to the use as student accommodation.
- The location of the site is sustainable.

- The standard of accommodation is acceptable.
- The extension of the building is acceptable in principle given it is over a less historic area of the building.
- The parking arrangement within the area (as having parking controls) limits the potential for overspill parking for occupiers of the development.

2.10 This feedback, alongside the full Heritage comments provided, have been taken into account when preparing the submission. The main pre-app comment in respect of the extension is that perspective views of the scheme should be submitted alongside an eventual application in order to confirm there will be no views within the setting of Listed Buildings, or the Conservation Area. This has been confirmed within the Verified Views Report, by Platform3.

3.0 PROPOSED DEVELOPMENT

3.1 The proposed development is for the material change of use of part of 52 and 53 Old Steine from Use Class E(g)(i) office use to Sui Generis student accommodation. This includes the construction of an extension above an under-utilised modern flat roof of the existing building.

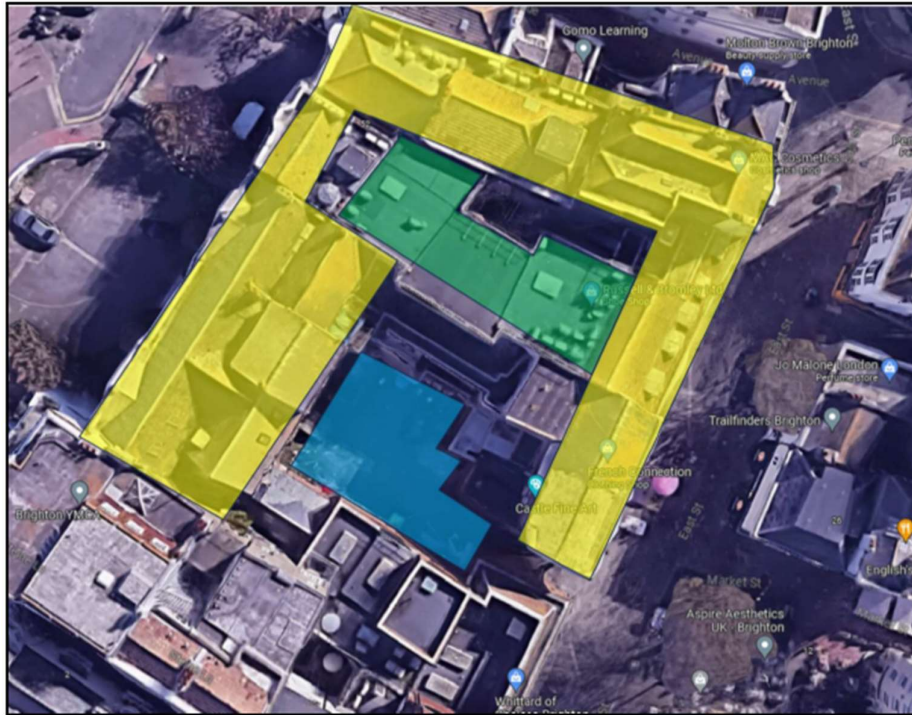


Image detailing the site, with nearby pitched roofs edged in yellow. The approximate area of the residential extension is edged in green. The area edged in blue is the rear courtyard of the site, and will be the area the extension can be viewed from.

3.2 The proposed extension to the building measures approximately 22.5m long, 11.5m wide and 2.8m high, and forms a natural extension to a modern element of the host building. This will be accessed by the central stairwell which serves the majority of the units. There are minimal other external alterations required to facilitate the development. The existing accesses from the Old Steine will be retained as existing, and the external forecourt area to the east will be retained.

- 3.3 The proposal creates 39 student rooms plus 152.5sqm of student communal space. This equates to approximately 3.9sqm of communal space per student. The individual rooms are generous in size and accommodate en-suites and kitchen space. Many of the rooms are extremely generous in size, with over a third being in excess of 30sqm.
- 3.4 The student rooms are presented as studios, in order to allow for greater independence of students. Further, a large social space is presented which hosts a communal cooking, dining, gaming and entertainment area.
- 3.5 The studios which front the Old Steine are to be used as short-term holiday lets over the summer months. These units were chosen as they are the larger units, have the most historical value, and benefit from sea views. The Case Officer for the pre-application report confirmed that this use would be ancillary to the use of the building as student accommodation.
- 3.6 Full existing and proposed plans by EDWS Architects are submitted with this application.

4.0 RELEVANT PLANNING POLICIES

4.1 The Development Plan comprises the City Plan - Part 1, and the City Plan – Part 2. The following policies are relevant to the determination of this application.

City Plan Part 1

4.2 SA2.3: *Central Brighton* states:

Within Central Brighton existing office accommodation will be protected and their refurbishment and upgrade encouraged. Proposals that result in the loss of B1a office floorspace will be permitted where owners/developers are able to demonstrate:

- a) The site has been marketed for B1a office use at a reasonable price and for a reasonable time period and no viable occupiers have expressed an interest in taking up the accommodation either as single/ multiple occupier so it has been concluded that the site is inherently unsuitable for continued B1a office use; and*
- b) That the redevelopment or reuse would make a positive contribution to the vitality and vibrancy of Central Brighton and create employment opportunities; or*
- c) That change of use was the only practicable means of preserving a listed building.*

The loss of office floor space complies with this policy as there has been a sufficient marketing period during which no viable occupiers have been identified. Further, the provision of social-led student accommodation in a central, sustainable location makes a positive contribution towards the vitality and vibrancy of the city centre.

SA3 – *Valley Gardens* states the aims for the area include:

- *Enhancing the appearance and setting of historic buildings*
- *Finding appropriate new uses for key buildings*

CP21: *Student Accommodation and Houses in Multiple Occupancy* supports the provision of additional purpose built student accommodation (PBSA) across the city. The policy states:

“To meet increasing accommodation demands from students and to create mixed, healthy and inclusive communities, the Council will support the provision of additional purpose-built accommodation and actively manage the location of new Houses in Multiple Occupation. The Council will continue to work closely with the two universities and other education providers to achieve these goals.”

Part A of policy CP21 states the Council will encourage the provision of PBSA to help meet the housing needs of the city’s students. Although the proposal is not new-build, as it is a change of use, the pre-application advice confirmed that the criteria within CP21 are applicable.

Policy CP21 states proposals for PBSA will need to demonstrate that the following criteria have been addressed:

1. Proposals should demonstrate that there will be no unacceptable impact upon residential amenity in the surrounding area through issues such as increased noise and disturbance;
2. High density developments will be encouraged but only in locations where they are compatible with the existing townscape (see CP12 Urban Design);
3. Sites should be located along sustainable transport corridors where accommodation is easily accessible to the university campuses or other educational establishments by walking, cycling and existing or proposed bus routes;
4. Proposals should demonstrate that they would not lead to an unacceptable increase in onstreet parking in the surrounding area;
5. Proposals should be designed to be safe and secure for their occupants whilst respecting the character and permeability of the surrounding area;
6. Schemes should demonstrate that they have entered into a formal agreement with one of the city’s two Universities or other existing educational establishments within Brighton and Hove. The council will seek appropriate controls to ensure that approved schemes are occupied solely as student accommodation and managed effectively;

7. Permanent purpose built student accommodation will not be supported on sites allocated for housing or with either an extant planning permission for residential development or sites identified as potential housing sites.”

CP3 Employment Land states that the loss of unallocated sites or premises in, or whose last use was, employment use will only be permitted where the site or premises can be demonstrated to be redundant and incapable of meeting the needs of alternative employment uses. Supporting paragraph 4.39 states:

“Redundancy and unsuitability for modern employment uses of unallocated sites or premises in employment use (Use Classes B1-B8) will be determined by considering the following criteria:

- a) location of the site;*
- b) quality of the buildings;*
- c) site or floor layout;*
- d) accessibility;*
- e) proximity to public transport/ trunk routes;*
- f) other uses in the neighbourhood*
- g) cost of demolition/ refurbishment sets against its future value for employment uses;*
- h) the length of time the site has been vacant*
- i) documented evidence of the marketing strategy adopted, particularly whether it has been marketed at a price that reflects local market prices and attempts to make the building attractive to different business or employment uses (the length of marketing will need to reflect the size and nature of the site or premise and therefore whilst a year is considered a 148 reasonable marketing period for small sites/ premises a longer period may be required for larger sites/ premises).*
- j) for office uses the prevailing vacancy rate for the size and type of office in Brighton & Hove should also be considered;*
- k) for an office building whether change of use is the only practicable way of preserving a building of architectural or historic interest”*

CP8: Sustainable buildings requires all development to include sustainable design features. Non-residential major development is required to meet BREEAM Excellent status.

CP9: Sustainable transport sets out that developments should encourage the use of sustainable transport modes.

CP12: Urban design requires development to raise the standards of architecture in the city, establish a strong sense of place by respecting the diverse character of neighbourhoods, enhance the city's built heritage and its setting and ensure external spaces are an integral part of the overall design approach.

CP15 Heritage states that the city's historic environment should be conserved and enhanced in accordance with its identified significance.

City Plan Part 2

4.3 The relevant policies from City Plan Part 2 are set out below.

Policy DM1 Housing Quality, Choice and Mix states the council will seek the delivery of a wide choice of high quality homes which will contribute to the creation of mixed, balanced, inclusive and sustainable communities.

DM7 Houses in Multiple Occupation provides guidance on the level of communal space that shared accommodation is expected to provide. Criteria (e) states "communal living space and cooking and bathroom facilities are provided appropriate in size to the expected number of occupants". Paragraph 2.69 states the minimum size of useable communal living space should be 4sqm per person. This requirement is analysed later within this report.

DM8 Purpose Built Student Accommodation states development should provide for the following:

- a) *predominantly cluster units;*
- b) *bedrooms of a sufficient size for living and studying;*
- c) *communal living space, cooking and bathroom facilities commensurate in size to the number of occupants of cluster flats;*
- d) *communal hub space commensurate in size to the number of studio units;*
- e) *acceptable daylighting to all habitable rooms;*
- f) *measures to promote the use of and provide access to sustainable transport including management arrangements to ensure occupants do not keep cars in Brighton & Hove; and*
- g) *effective and appropriate 24 hour security presence.*

Policy DM18 High Quality Design and Places requires development to demonstrate a high standard of design and make a positive contribution to a sense of place and the visual quality of the environment.

Policy DM19 Maximising Development Potential states proposals should seek to maximise opportunities for the development and use of land to ensure the efficient and effective use of available sites.

Policy DM20 Protection of Amenity states planning permission for development including change of use will be granted where it would not cause unacceptable loss of amenity to the proposed, existing, adjacent or nearby users, residents, occupiers or where it is not liable to be detrimental to human health.

Policy DM21 Extension and Alterations sets out the criteria which extensions and alterations should meet in order to be granted planning permission. This includes the need for good design, scale and siting, account for the character of the area, and use of materials to complement the host building.

DM26 Conservation Areas requires development to preserve or enhance the distinctive character and appearance of that conservation area, taking full account of the appraisal set out in the relevant character statement.

DM27 Listed Buildings states a listed building should be retained in viable use and good repair. Proposals involving the alteration, extension, or change of use of a listed building will be permitted where they would not harm the special architectural or historic interest of the building.

5.0 PLANNING ASSESSMENT

5.1 The main considerations in this proposal are:

- The principle of development
- Design and character of the area
- Amenity future occupants
- Amenity of adjacent occupants
- Highways

5.2 A separate Heritage Statement has been submitted with this application.

Principle of Development

5.3 The proposal would result in the loss of office space, to provide student accommodation (Sui Generis use). The site benefits from unrestricted Class E use, however, it has been vacant since March 2020. 52-23 Old Steine has been marketed since 25th March 2021 by Carr & Priddle with no let being successfully secured. A marketing report by Carr & Priddle (dated 1st February 2024) is submitted with this application setting out the marketing strategy and reasons why interested parties have not chosen to pursue occupation of the Class E premises.

5.4 The continued vacancy of the property demonstrates the site's redundancy as a commercial premises. To assess the loss of employment space against the requirements of Policy CP3, the relevant criteria are set out below, followed by a discussion on how the site performs against each criteria.

a) location of the site;

The location of the site is ideal for potential Class E occupiers, being in central Brighton and walking distance of local amenities, and sustainable transport links.

b) quality of the buildings;

The buildings are overall of an acceptable quality, albeit modernisation is somewhat restricted due to the Listed status of the buildings.

c) *site or floor layout;*

The offices have a particularly complex floor layout comprising the original two Regency-era houses arranged over five floors. The complexity of the floor layout is evident from review of the submitted plans.

d) *accessibility;*

The offices were constructed prior to the Disability Discrimination Act 1995 and therefore do not have any provision for disabled access. There is stepped access only into the buildings. The site entrance is via a side road directly off the A23 northbound carriageway. Access for larger vehicles is not possible due to the Grade II listed external wall, public car parking immediately opposite and the single-vehicle lane access.

e) *proximity to public transport/ trunk routes;*

The site is in excellent proximity to public transport.

f) *other uses in the neighbourhood*

There are a wide range of commercial and residential uses in the neighbourhood.

g) *cost of demolition/ refurbishment sets against its future value for employment uses;*

The site is suitable for occupation in commercial use and has been marketed for this purpose since March 2021. If an occupier did require alterations to the building these may not be possible due to the Listed status of the building, or the additional costs and timescales associated with the works due to the status of the building may be prohibitive. Most modern office occupiers either require or prefer open plan spaces, which would require extensive internal works to most of the site to accommodate and would result in significant disturbance to the historic fabric.

h) the length of time the site has been vacant

The site has been vacant since March 2020, and marketed since March 2021.

i) documented evidence of the marketing strategy adopted, particularly whether it has been marketed at a price that reflects local market prices and attempts to make the building attractive to different business or employment uses (the length of marketing will need to reflect the size and nature of the site or premise and therefore whilst a year is considered a 148 reasonable marketing period for small sites/ premises a longer period may be required for larger sites/ premises).

This is provided in the Carr & Priddle marketing report. This Planning Statement should be read in conjunction with this document.

j) for office uses the prevailing vacancy rate for the size and type of office in Brighton & Hove should also be considered;

This is provided in the Carr & Piddle marketing report. Note the premises is now an unrestricted Class E use, not just an office use.

k) for an office building whether change of use is the only practicable way of preserving a building of architectural or historic interest.

Vacancy is not in the best interest of the preservation of the Listed building. With no Class E tenants taking the lease, the best option is to change the use of the building to bring it into use.

5.6 It is clear there are significant challenges associated with the commercial use of the premises. This mainly includes restricted access to the site, and the compromised internal layout. The obstacle these factors present is evident by the fact the premises remain vacant.

5.7 For these reasons, the use of the site as a commercial premises is largely redundant, and therefore the change of use to provide student accommodation, which there is a demand for in the City, is acceptable in principle.

Design and Character of the area

- 5.8 The application predominantly relates to a change of use, with minimal external alterations proposed to the existing buildings. Therefore, this section will focus on the consideration of the fourth-floor extension, which is situated atop a modern element of the building.
- 5.9 The main policies for considering the design of the development proposal and the character of the area are DM18, and DM21 of the Local Plan Part 2. These policies require a high standard of design for developments and ensure proposals have a positive contribution upon the sense of place, and visual quality of the environment. Further, extensions to buildings should account for the character of the building, and the area through the use of materials to complement the building.
- 5.10 The proposed extension is situated centrally, and therefore there are no views of the proposal from the public realm. Views of the extension are only available from the private courtyard. This is because the extension features a flat roof which is set behind the pitched roofs found to its eastern and western aspects. There is a small extension which will house the water tank to the northern side of the residential extension which is also not visible from the public realm. The extension is appropriately scaled to ensure that there will be no views from the public realm, which allows the proposal to have a neutral impact on the appearance of the listed building, the sense of place of the locality, and the character of the area.

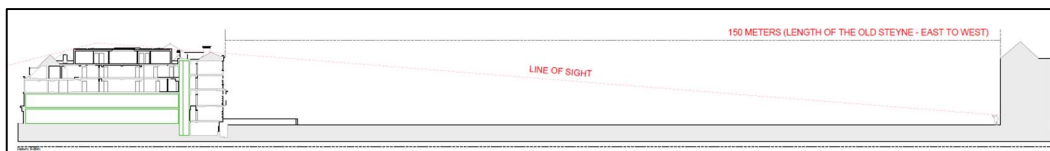


Image showing the sightlines from the public realm (in full)



Excerpt from the above plan showing the sightlines (in red). There will be no views of the extension from the public realm.

- 5.11 Part a) of DM18 states that development should respond to local context, and part b) DM18 sets out that proposals should respond to the shape and scale of nearby buildings. This is one of the starting points when considering the design of development proposals, and it is clear there has been significant design consideration to ensure the extension responds to the local context. The section plan excerpts above demonstrate that the extension responds to local context through its height and design, as there will be no views of the extension from the public realm.
- 5.12 The rear courtyard is an underutilised area of land which serves as private amenity space, and a servicing area for the subject site, and the neighbouring building. Despite the fact this courtyard is a private area, which is therefore not accessible by members of the public, it remains important to consider how the extension will appear in the context of the existing building. The extension utilises an attractive palette of materials, including natural zinc cladding which has been chosen to differentiate the extension from nearby historic buildings. There will be no harmful impact on the views of the host building from this courtyard area due to the attractive appearance of the extension.



Image showing the view of the extension from the courtyard.

- 5.13 Policy DM21 considers extensions to existing buildings and sets out the relevant criteria these extensions should be considered against. These criteria are set out and addressed hereafter:
- 5.14 “a) ...well designed and scaled, sited and detailed in relation to the property to be extended, adjoining properties and to the surrounding area”

The extension measures approximately 22.5m long, by 11.5m wide and 2.8m high. It is sited above an existing modern element of the building. Given the mix of ages, design and detailing present at the existing property, the proposed extension has been purposefully designed to differentiate the extension from the historic fabric of the building, and the 19th Century elements of the building. In respect of the scaling of the extension, it is clear it has been designed to respond to the existing property and nearby properties given the lack of views of the extension from the public realm. This is further detailed within the excerpts from the verified views report below:



This image shows prospective views of the site from the opposite side of Old Steine. The red outline has been added to show the prospective location of the extension. Views will be screened by existing built form.

5.15 *“b) takes account [of] the existing character of the area.”*

As set out previously within this statement, there are no views of the extension from the public realm, and there will therefore be no impact upon the character of the area. However, the extension clearly takes account of the existing character of the area. The area is of a mixed character, with a variety of building styles, ages and scales. The proposed extension is an attractive addition to the existing building which results in no impact on the surrounding area.

5.16 *“c) Uses materials that complement the parent building”.*

The existing building features a plethora of different materials, however the main wall material is white render. The proposed extension will be clad in natural zinc cladding. This creates visual interest, through the creation of a visual juxtaposition, by way of the use of contemporary materials and traditional materials. It must be emphasised that these views are visible only from the private courtyard.

- 5.17 The proposed development is acceptable with respect to its design and impact on the character of the area. The proposed extension introduces a highly attractive, well-designed and appropriately scaled addition to the host building. Further, the proposal is not visible from the public realm. The extension complies with the relevant policy criteria of DM18, and DM21 of the City Plan Part 2.

Amenity future occupants

- 5.18 The future students will benefit from a high standard of amenity. This is demonstrated against the criteria set out in policy DM8 regarding Purpose Built Student Accommodation. Whilst the development is not new build, the pre-application advice stated policy DM8 should be used as a guide.

a) *predominantly cluster units;*

The layout is arranged as individual student rooms, which benefit from en-suites and kitchen space in each room. Rooms are accessed through the shared circulation spaces, which run through the 'core' of the building. There is one centralised communal space on the third floor, which features a communal kitchen, dining area, living/cinema area, and a games area. Therefore, whilst the design is not of cluster units specifically, the large central communal space essentially creates the entire unit as one 'cluster'. The bedrooms have been significantly upgraded under this application from bedroom units (as approved under the previous permission) to self-contained studios. This allows for greater independence of students and socialising within rooms. It also allows for the creation of a large, open social space. This will also minimise interventions into the fabric of the Listed building and provide flexibility, and greater social cohesion between future residents.

b) *bedrooms of a sufficient size for living and studying;*

All bedrooms are generous in size with ample space for living, studying and socialising with other students. All have en-suites and a kitchen area. The minimum bedroom size is 18sqm, and the maximum is 45sqm.

- c) *communal living space, cooking and bathroom facilities commensurate in size to the number of occupants of cluster flats;*

There is approximately 3.9sqm of communal living and kitchen space per resident. All rooms have their own bathroom and kitchen. All rooms are of a significant size ranging from 18 to 45sqm. The generously proportioned rooms allow students to socialise within their rooms as well as the designated communal spaces. It is noted the communal space provision is slightly below that set out within the guidance in paragraph 2.69 of the City Plan – Part 2. However, we believe that because the studio rooms are of a generous scale, which allows for social mixing and interactions within rooms.

- d) *communal hub space commensurate in size to the number of studio units;*

Rooms are very large, with the average room size being approximately 25sqm., and the largest rooms being over 45sqm. These large rooms mean students will be more likely to comfortably study and socialise within rooms. All rooms have en-suite and cooking facilities. The communal areas provide very high-quality facilities for socialising, including a cinema area, laundry facilities, pool tables and table tennis. The result of these factors is that whilst the communal space is less than 4sqm per person, the accommodation is of a very high standard for these future occupiers.

- e) *acceptable daylighting to all habitable rooms;*

All rooms and communal areas have natural light and ventilation. In the converted element of the building, this is provided by existing windows. This avoids interference with the external fabric of the listed building elements of the scheme.

- f) *measures to promote the use of and provide access to sustainable transport including management arrangements to ensure occupants do not keep cars in Brighton & Hove; and*

The site is within a sustainable location in central Brighton with immediate access to sustainable transport options along the Old Steine. This connects the site to Lewes Road to the north where the universities are

located. The site is also within walking distance of Brighton mainline train station and all of the facilities within the regional city centre. The site is within a controlled parking zone Z, and therefore access to parking can be controlled by the Council.

g) effective and appropriate 24 hour security presence.

Given the scale of the use, permanent on site security is not considered to be necessary, however, there is a management plan for the premises which would include the provision of security presence at appropriate times. This statement should be read in conjunction with the submitted management plan. There is an on-site reception at the entrance to the building and a parcel room for packages and mail. A dedicated cleaners store is included in the application to allow for on-site maintenance.

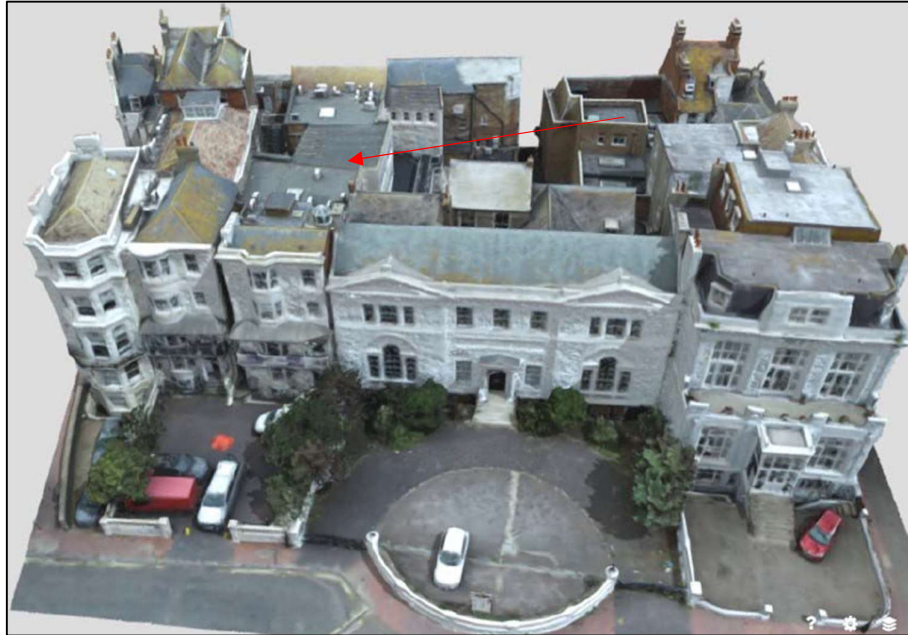
5.19 For these reasons future residents will benefit from a high standard of amenity and the proposal is in compliance with Policy DM8.

5.20 The proposal facilitates good quality student accommodation in a highly sustainable location. The site is in a good location for student accommodation, given the presence of significant local amenities.

5.23 Therefore, it is clear that occupiers of the development will benefit from a high level of amenities, as set out within Policy DM8 and DM20 of the Local Plan.

Amenity of adjacent occupants

5.14 The only feature of the proposal which increases floor space is the fourth-floor extension, which is located centrally to the building. This extension will not result in any harmful overshadowing or overbearing impact upon nearby occupiers due to its scale and the separation distance from nearby occupiers. Neither of the adjacent buildings are in a residential use, and have commercial occupiers.



3D render of the existing building. The flat roof where the proposal will be sited is indicated by the arrow.

5.15 The use of the site as an office would generate a high level of activity. The Government’s latest employment density advice is provided in the Homes & Community Agency publication “*Employment Density Guide 3rd Edition*” dated November 2015. The guide shows that Class B1 offices typically employ 1 worker for every 8 to 13m² of floor space:

| Use Class | Sub-Category | Sub-Sector | Density (sqm) |
|------------------------|----------------|-----------------------|---------------|
| B1a Offices | General Office | Corporate | 13 |
| | | Professional Services | 12 |
| | | Public Sector | 12 |
| | | TMT | 11 |
| | | Finance & Insurance | 10 |
| | Call Centres | 8 | |

5.16 Therefore, the existing office use, which comprises 1415sqm of floorspace, could provide employment for up to 177 people if in an office use. The proposed student accommodation use would allow for up to 39 student occupants. It is noted there would be other movements associated with this change of use, including the staff associated with the proposed use.

- 5.17 It is accepted that the nature of the use would change, as the 39 students would be living at the site permanently during term time. However, the change in the nature of occupation at the site is more than offset by the significant reduction in the volume of people using the site. The result of this would be a reduction in overall activity associated with the site, ensuring that the proposals are acceptable in terms of impact on adjacent residential and commercial occupiers.
- 5.18 The proposed external alterations to the building will not result in any harmful overshadowing or overbearing impact on nearby occupiers due to its siting and scale. Resultant of these factors and due to the development significantly reducing the number of occupiers at the site, it is considered that the amenity of adjacent occupiers will be protected.

Highways

- 5.19 The existing parking area, accessed from Old Steine is to be retained as part of the development. This will provide an EV charging space for secure staff vehicle parking, secure cycle parking, as well as waste and recycling facilities.
- 5.20 The site is also in a highly sustainable location, with immediate access to bus services and cycle routes on the Old Steine, and the site is also within walking distance of Brighton railway station.

6.0 CONCLUSIONS

- 6.1 The proposal seeks full planning and listed building consent for the change of use of 52-53 Old Steine, Brighton, from Class E(g)(i) office use, to a Sui Generis student accommodation use. This includes a fourth-floor extension above a modern element of the building, and associated works. The development also proposes internal alterations to the grade II Listed buildings. A full schedule of works and the impact of the works is assessed in the Heritage Statement.
- 6.2 The proposal will create 39 student rooms and communal areas totalling 152.5sqm. Information submitted with this application demonstrates the redundancy of the office space, and the high level of amenity that the future occupants of the student accommodation would benefit from.
- 6.3 It has also been demonstrated that the proposal will protect the amenity of surrounding residents, and is acceptable in highways terms as the existing forecourt can provide secure car and cycle parking, as well as reuse and recycling facilities, as required by the Council.
- 6.4 The proposal is fully compliant with national and local planning policy. For these reasons, we ask the Council to approve the application without undue delay.

Lewis & Co Planning

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