

also with respect the Council's Tall Buildings policy (SPG15) (higher than 18 metres or approximately 6 storeys). The site is not an area designated within SPG15 to be suitable for tall buildings. The Western Seafront/Kingsway area is defined to commence at the Western Hove Lawns. Whilst proposals for the King Alfred site may include 'tall buildings' this site specifically is not part of the King Alfred site. It should also be noted that no Planning Proposal has been submitted for the King Alfred site, so this application must be considered on its merits alone.

2. Impact on a Conservation Area.

SPG 15 states 'Tall building proposals within conservation areas or affecting the setting of listed buildings or conservation areas or registered historic parks and gardens will only be approved if applicants can demonstrate, through a conservation impact assessment, that the surrounding area's character or appearance or the setting of any listed building or historic park or garden will be preserved or enhanced.' It is appreciated that the majority of site sits outside the Cliftonville Conservation area, although the Alibi pub does sit within it. The proposal will have a significant negative visual impact on the adjacent Conservation Area.

3. Impact on access to light and amenity of adjacent buildings.

Residents have expressed concern that the building will negatively impact access to light, and this is confirmed by the Daylight and Sunlight Study (Neighbouring Properties). The report specifies properties at Kingsway and St Aubyns Mansions which will lose a significant amount of light. There are also concerns regarding overlooking of neighbouring properties, thereby negatively impacting their amenity.

4. Insufficient Parking

The development of 59 units, with only 9 spaces designated for resident parking and 8 for parking to access the retail premises is insufficient. The Zone N parking zone is fully subscribed and there is no availability for on-street parking overnight as usually all spaces are full. At 8th September the Council's website stated 'There is a waiting list in Zone N for both resident and business permits'. I therefore contest the view Transport Statement which states sufficient places are available. It is appreciated that 50 of the units are to be designated 'car free', but some residents and visitors will use cars and I am mindful of successful campaigns to have 'car free' status overturned. Initial proposals, shown to the public did provide greater numbers of resident parking bays, and it is requested that these plans are revisited.

Additionally, traffic in the area, and parking demand during the day time is much heavier during summer months. Therefore a Parking Assessment of January 2016 very probably underestimates parking pressure in the vicinity.

5. Welcome cycle parking provision.

The development provides for the parking of 72 bicycles. This is a significant enhancement and is welcome, particularly so as some of the provision is sited in such a way to prevent pavement parking, which is a very serious problem in the area.

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