

# STEPHEN JUPP

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## CHARTERED TOWN PLANNER

Planning and Building Control Division  
Arun District Council  
Maltravers Street  
Littlehampton

Thursday, 28 August 2025

Dear Sir/Madam:

### Re: 3 & 4 Queen's Square, Bognor Regis

**Change of use of properties from 2no separate bed and breakfast accommodation units each having owners accommodation and communal lounge and dining areas at ground floor and 7no B&B bedrooms at first and second floor to C2 use comprising staff room and 10no C2 Supported Housing units.**

I write in connection with the above case and have the pleasure of enclosing my client's planning application.

Historically, both properties have been used for a considerable period of time as interlinked HMOs, providing some 9no self-contained HMO units

I can find no record of any permission being granted for such uses, but due to the passage of time it is clear that such uses were carried out for such a long period of time that they would have been immune from enforcement action.

In 2015 I applied for the change of use of the properties from "10 HMO units to 2no separate bed & breakfast accommodation units each having owners accommodation & communal lounge & dining areas at ground floor & 7 B&B bedrooms at first & second floor".

Planning permission was granted on 5<sup>th</sup> October 2015. The permitted 'Proposed Floor Plans' are attached to this current submission but have been relabelled from Sheet 5 to Drawing 6.

Whilst I described the historic use as HMOs it would appear that they were individuals flats since none of them shared any facilities with the other.

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It would appear that the changes to the floor plans were never implemented and the use of the rooms, combined with the separation of all of the units remained. That said, the owner provided breakfasts for all occupiers. This has been, and remains to this day, provided by the owner buying food for their breakfast and this is provided for them fortnightly and this provision forms part of the rental payment.

This application is a change of use only. Accordingly, elevations are not required, nor is a design and access statement.

This application is being prompted on behalf of EHSL Supported Housing who have written a letter of support which accompanies this application.

As set out in their letter, EHSL is a registered charity and housing association that provides specialised intensive housing management services for tenants with mental health diagnoses and learning disabilities including autism. EHSL works alongside support providers and landlords to ensure that the people that we provide housing to are supported appropriately in accommodation that meets their needs. This includes sourcing accommodation in the community owned by private landlords, developing bespoke housing solutions and supported living schemes, and working with care and support providers that own the properties they operate in, to ensure that sufficient housing management and associated support services are provided to our tenants.

Throughout EHSL's 13 years of operation in the supported living sector, we are greatly aware of the existing and ever-increasing demand for suitable and specialised accommodation for vulnerable adults. The configuration of units you have outlined will aid in fulfilling a national demand for single occupancy self-contained flats. These types of units are highly sought after by commissioning authorities and are difficult to source through the private rental market. There is no requirement for communal areas within the property, and the introduction of said communal areas could be detrimental to the model, due to the drive to encourage self-sufficiency and independence of the service users.

The proposed development site is well located near public transport links that will allow vulnerable tenants access to the community and is within walking distance to grocery stores. The configuration of flats within the block will give EHSL and the care provider the ability to house vulnerable adults who require 24/7 support and give them the opportunity to develop their independence.

IN terms of staff employment, the total number of staff will be 9FTE with two staff on at any one time during the day and one staff member on at night time.

Finally, in the previous application concern was raised by the case officer that one of the units fell well below the floorspace set out in the National Described Space Standards. However, those standards only apply to C3 uses and this scheme is for a C2 use. There are no prescribed or standard unit sizes for Use Class C2 and what determines a property's suitability for C2 is whether it meets the needs of the residents requiring care, not its total square footage. In this case, EHSL are satisfied that all units will provide the occupiers with a satisfactory living environment.

Finally, I do not consider that contributions towards Pagham Harbour Recreational Disturbance are applicable for C2 uses.

I therefore consider that the application is acceptable on all counts, and I therefore trust that officer support will be forthcoming.

However, can I ask that if there are any queries concerning the application that the case officer, prior to any formal recommendation being formulated, contacts me?

Yours sincerely,



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