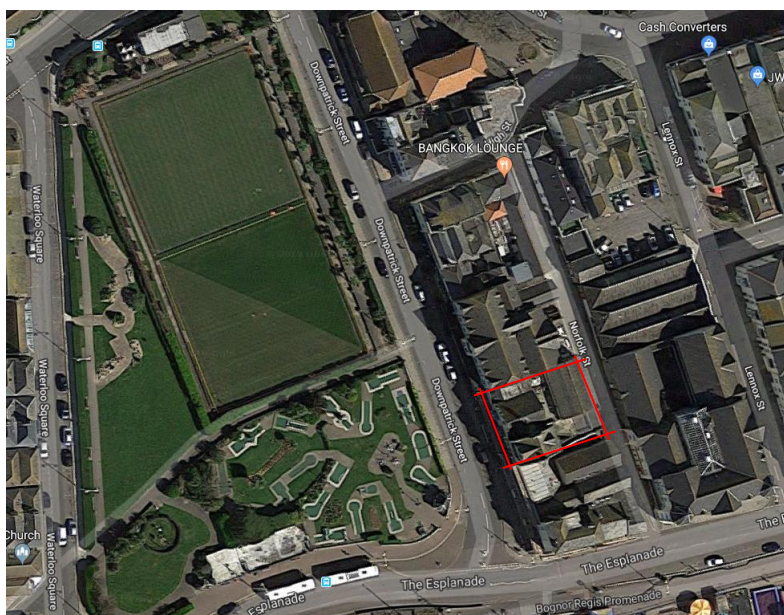


2-4 Waterloo Square Bognor Regis PO21 1SU

Design & Access Statement (DAS) (18-1236)

Issue Status:

Revision	Date	Description
-	23 Jul 18	Issued in support of Application for Demolition in a Conservation Area



Aerial View of 2-4 Waterloo Square (Red Box)



Image of Site when from Waterloo Square (July 2018)

Introduction:

An application is to be made to Arun District Council for the following

- Total demolition of the Residential Dwellings 1-5 and ground floor Retail Units at 2-4 Waterloo Square and associated Boxing Gym accessed from Norfolk Street

Context of the Site:

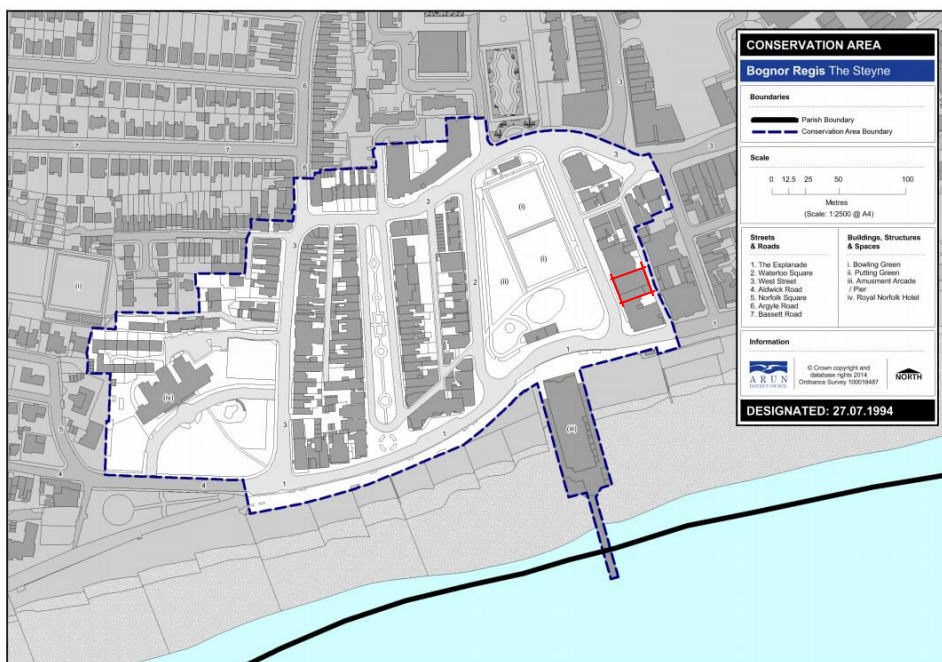
The site, contains a mixture of Ground Floor Retail and Upper Floor Residential Flats. The Ground Floor has two areas No. 2 Waterloo Square occupying a gross footprint of 155 m² and No. 4 Waterloo Square occupying a gross footprint of 327 m².

The upper floor flats of which we understand there to be 5 No. in total are accessed via two external stairs which have their primary access point off Norfolk Street. The flats which are a mixture of 2 No. 1 beds and 3 No 2 beds, each unit having its own external front door and are accessed across a first floor flat roof area.

The site occupies an overall area of 508 m² (0.0508 hectares) measured from Promap and is sandwiched between Waterloo Square and Norfolk Street.

There is no on site vehicular parking. Limited parking is available road side and in the nearby public car park at Hothampton Car park in Queensway, North of the site. It is unknown where the residential occupants used to park.

The Buildings (2-4) are noted as being “Locally Listed” and located within the “The Steyne” Conservation Area as shown below. The site is noted by the red lined area.



Plan from Arun District Council Mapping System

Arun District Council has a Local Validation Requirement (LVR) list for all planning applications, which has been completed for this application. There are a number of the LVR's that are not relevant to this application, but the relevant ones are covered in this DAS

Ecology:

An Ecological Survey & Assessment (Phase 1) has been carried out by EcoSupport and is issued within a separate document. A Biodiversity Checklist has also been completed and submitted as part of the application

A Protected Species Survey Checklist has also been completed and submitted with the application, but there are no soft landscaped areas and the building is totally enclosed, therefore offering no facilities for wildlife or protected species

The proposal falls outside the Schedule 1 and Schedule 2 projects as defined by the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations) 1999, therefore not requiring an EIA.

Structural Survey :

Due to the condition of the buildings (2-4) it is not possible to fully measure the floor plans and exterior of the building. Instead a number of photos have been taken to illustrate the building and these are in Appendix A

H J Concepts Ltd undertook a structural review (where safe access permitted) and two documents were issued: (i) 21st May 2018 and (ii) 11th July 2018. These highlighted to state of the structures primary steel support beams, which were found in many cases to be in a serious condition, with one over the ground floor frontage of No. 2 Waterloo Square showing serious and extensive corrosion and in our opinion rendered the structure in an unsafe and unstable condition and poses a threat to life, given its location within a prime tourist and public area. Both these reports are included as part of the application.

Flood Risk Assessment:

The site is connected to the main Southern Water public sewer for both storm and foul drainage and is within a Flood Zone 1 as noted on the GOV.UK Long Term Flood Risk Information Website

Heritage Statement:

2-4 Waterloo Square are a pair of 2 and 3 storey buildings with a Dutch or Flemish gable façade with a pediment at the top and the exterior rendered with a number of decorative features. The buildings have been extensively altered over the years, with a mixture of authorized and un-authorised works.

Below is a series of historic images of the site from a number of web-based sites

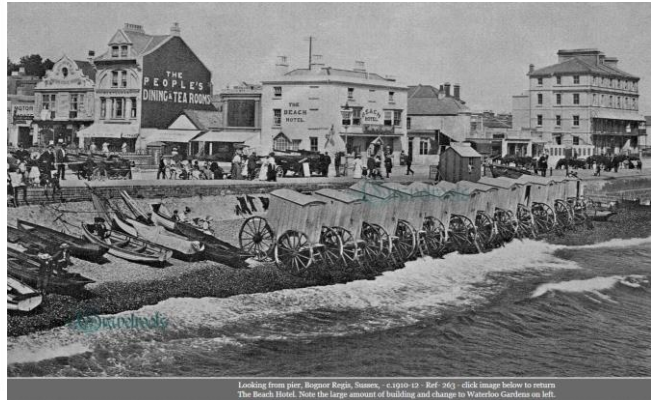


Image A (subject buildings on the far left of the image)

Image B (subject buildings on the far left of the image)

Image A - Waterloo Square from the Pier in 1903. Image courtesy of the Francis Frith Collection Photo Ref 50184

Image B - Image of the site from the Pier circa early 1910-1912

Following a brief investigation in to the age of the building it is uncertain what the primary steel structure has been constructed with. The Institute of Structural Engineers published a document in October 1996 “Appraisal of existing structures” 2nd Edition and Michael Bussell (Building Conservation) published “19th Century Structural Ironwork in Buildings”

Within these documents it notes the historic use of cast and wrought iron in buildings and when steel was introduced. There appears to be an era when both wrought Iron and Steel were both used:

Cast iron

- Beams and inclined roof rafters, etc – from the 1790s until c1870
- Columns – from the 1790s until c1910

We believe the building is later than this and as such cast ironwork is unlikely to be within the structure. However this cannot be ruled out totally.

Wrought iron

- I-section beams (small) and fabricated riveted plate girders and trusses – from c1850 until the 1890s
- Wrought iron columns – rare (cast iron columns were stronger and cheaper)
- Tie-rods and strapping to timber roof trusses – from late Medieval times until the 1890s

Steel

- Introduced c1885, dominant by c1900; had displaced both cast and wrought iron by 1914

The building appears to sit within the period of both wrought iron and steel and given the appearance of riveted plate girders this type of material cannot be ruled out.

Relevant Planning Policies:

Arun Local Plan 2011 – 2031 Adopted 18th July 2018 Policies HER PS1, HER DM2 and HER DM3 is relevant to this application as the application site is (i) within The Steyne Conservation Area (Eastern Edge) and (ii) 2-4 Waterloo Square have been identified as “Locally listed” Structures.

Policy HER SP1

The historic environment

The Local Planning Authority will grant planning permission or relevant consent for development proposals that conserve or enhance the historic environment of the District, based on the following approach:

Designated heritage assets including listed buildings, structures and their settings; and Conservation Areas will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance.

Non-designated heritage assets including locally listed heritage assets (Buildings or Structures of Character and Areas of Character) and their settings will also need to be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment;

Development likely to prejudice any of the above, including their settings, will be refused.

Any proposals for development will be required to comply with all other relevant policies and reflect any relevant appraisals or management proposals adopted by the Local Planning Authority.

The Local Planning Authority will encourage the re-use of vacant or underused Listed Buildings or unlisted buildings by approving proposals that contribute positively to their conservation either individually or as part of wider strategies for regeneration. Where changes of use are proposed, the Local Planning Authority will consider these in a flexible way but will favour proposals which improve public access where these are not prejudicial to existing character or appearance.

The Local Planning Authority will take a pro-active stance to any heritage assets that may be at risk. This will include working with property owners to find a use that will enable them to be put back in to use.

Development proposals involving the demolition of Listed Buildings or substantial harm to a Conservation Area will not be permitted unless it can be demonstrated that the loss or harm achieves substantial public benefits.

Over the past decade the buildings have been extensively altered internally and it can be seen from images P14 and P15 (Appendix A) that a more recent internal change had been started but abandoned some time ago.

The exterior of the buildings has also undergone several alterations to enable modern day use, with a number of bolt on additions that don't compliment the original structure, but allowed a modern day change of use to the buildings. These have now fallen into disrepair through a complete lack of maintenance (short and long term) and as a consequence the current structures have fallen into a sorry state of repair. This has not been helped by the fact that the buildings have been vacant and partially vacant for a good number of years.

Following a more recent investigation, which has come about due to a change of Lease holder-ship, it has noted that a good number of the primary structural support beams have extensive and serious corrosion and decay. As a result Arun Building Control were put on notice with the building being classified as a “dangerous structure” due to the location of the building and the condition of the visible primary steel beams.

Policy HER SP1 discusses the Council's stance on the retainment and importance of Listed and Locally Listed structures in Conservation areas and that any proposals to demolish such structures should be examined.

2-4 Waterloo Square are a pair of 2 and 3 storey buildings with a Dutch or Flemish gable façade with a pediment at the top and the exterior rendered with a number of decorative features.

It is clearly demonstrated from the long term vacancy of the buildings on the ground floor that the current layout is struggling to provide a viable and sustainable commercial use and that fundamental changes would be required to bring the ground floor into a long term and enhanced use that will bring a benefit to the local environment. The work will also need to include extensive refurbishment and structural intervention to make the building habitable and structural safe. Due to the aggressive nature of the local environment there will be many items not yet exposed that will require costly intervention.

Whilst the first floor residential flats have had some use and benefit to the community, it is clear that their access and overall facilities fall well short of what is acceptable in current climates and Building Regulation Standards.

The first floor gym structure adds nothing to the enhancement of the Locally listed building and if anything is detrimental to the conservation area and adds nothing to the value and environment in Norfolk Street, which is a very impoverished environment.

It should be noted that Arun District council are the freeholders for 2-4 Waterloo Square and ultimately have an overriding commitment to the preservation of the buildings and their maintenance due to their custodial responsibilities. Policy HER SP1 cites that *"The Local Planning Authority will take a pro-active stance to any heritage assets that may be at risk. This will include working with property owners to find a use that will enable them to be put back in to use."* It is evident that the buildings have been neglected for many years prior to the recent change in lease ownership and as a result the primary structure in this aggressive atmosphere has suffered extensive damage, to the point of which that vast quantities of resources would be required to bring the buildings back into an acceptable level of structural stability and sustainable use. It is clearly evident that this Policy or it's predecessor has not been complied with for many years and as such, we are now left with a dangerous structure and a fundamental policy failure.

It should also be noted that the outcome of the pre-enquiry, was that Arun DC are supportive of redevelopment and regeneration of the Southern corner of Waterloo Square, which is a landmark and very prominent site, which overlooks the Grade II Listed Pier and esplanade.

It is therefore proposed that this application for regeneration / development is inline with Policy HER SP1 and that the benefits and enhancements of any new development will provide substantial public benefits and enhance the local environment in this area of Waterloo Square.

Paragraph (16.3.3) of the Building Conservation & Archaeological Heritage also goes on to cite what is important for the protection of Locally Listed Buildings.

16.3.3 *The Local Plan attaches importance to the protection of Locally Listed Buildings. Although these buildings are not subject to statutory protection, the Local Planning Authority will utilise its planning powers to ensure that wherever possible the special character of such buildings is protected and enhanced. Any works carried out should preserve or enhance the building and any features of architectural or historic interest retained and appropriate materials used.*

It must be said that the buildings at 2-4 have been let down over the decades by the Local Authority who have the Freehold for the buildings and as such the overriding responsibility to ensure that any leasehold tenant performs their responsibilities for ensuring the protection and preservation of the Locally Listed Buildings.

Policy HER DM2

Locally Listed Buildings or Structures of Character

The Local Planning Authority will continue to identify and compile a list of locally important buildings and structures which make a positive contribution to local distinctiveness using the following criteria:

- a. Buildings of outstanding design, detailing, appearance or special interest because of the use of materials.*
- b. Buildings which are extremely good examples of traditional or established style, or of unusual type.*
- c. In special cases, buildings or structures which contribute towards the local townscape or have important historical or social associations.*
- d. All buildings must be largely intact and not adversely affected by later extensions or alterations.*
- e. Preferably, although not exclusively, they should make a positive contribution to their surroundings or the street scene.*

Applications will only be granted for development which results in the loss of existing Locally Listed Buildings or Structures of Character when it can be demonstrated that the building or structure cannot be put to a beneficial use or re-use.

Replacement structures will need to be of a high quality design. There may be circumstances where the public benefit from the proposed development outweighs any proposed harm, in such circumstances, the proposal will need to be justified as appropriate.

Proposals for the alteration or extension of buildings on the Local List will be expected to relate sensitively to the building or structure and its setting and respect its architectural, landscape or historic interest. The Local Planning Authority will seek to preserve features of such buildings which contribute to that interest.

Due to the historic neglect, changes and additions to the buildings it could be said that the buildings no longer offer an “*extremely good example (b)*” or a building which is “*largely intact and not adversely affected by later extensions or alterations (d)*.”

It is clearly evident that the buildings through their long-term vacant existence do not offer a beneficial contribution to the conservation area and that a redevelopment of the site will provide a public benefit that will regenerate the area, which will outweigh any loss of the buildings.

It is therefore put that the demolition of 2-4 Waterloo Square is beneficial to the conservation area and outweighs the loss of a Locally Listed building which is not in a sound and useable condition and with the adjacent site offers an exceptional opportunity for redevelopment of a prominent and landmark site on the Bognor Regis esplanade opposite the Grade II listed pier. The proposal therefore recognises Policy HER DM2 and brings a positive opportunity for Bognor.

Policy HER DM3**Conservation Areas**

In order to preserve or enhance the character or appearance of the Conservation Area, planning permission or relevant consent will normally be granted for proposals within or affecting the setting of a Conservation Area, provided that:

- a. New buildings and structures acknowledge the character of their special environment in their layout, form, scale, detailing, use of materials, enclosure and the spaces created between buildings;*
- b. Alterations or additions to existing buildings are sensitively designed, constructed of appropriate materials and are sympathetic in scale, form and detailing and retain or emphasise the features and qualities of the existing buildings, townscape or streetscape in the area;*
- c. Traditional features such as shop fronts, walls, railings, paved surfaces and street furniture are retained and restored;*
- d. Unsympathetic features are removed and missing features are restored or reinstated;*
- e. It retains historically significant boundaries, important open spaces and other elements of the area's established pattern of development, character and historic value, including gardens, roadside banks and verges;*
- f. It does not harm important views into, out of or within the Conservation Area.*

Within Conservation Areas, permission for development involving demolition or substantial demolition will only be granted, subject to conditions, if it can be demonstrated that:

- k. The structure to be demolished makes no material contribution to the special character or appearance of the area; or,*
- l. It can be demonstrated that the structure is wholly beyond repair or incapable of beneficial use; or*
- m. It can be demonstrated that the removal of the structure and its subsequent replacement would lead to the enhancement of the area; and*
- n. Permission has been granted for the redevelopment of the site.*

It can be seen from the photographic evidence (Appendix A) that the site at 2-4 Waterloo Square is not in a stable and sound condition and has many unsympathetic qualities which are detrimental to the conservation area.

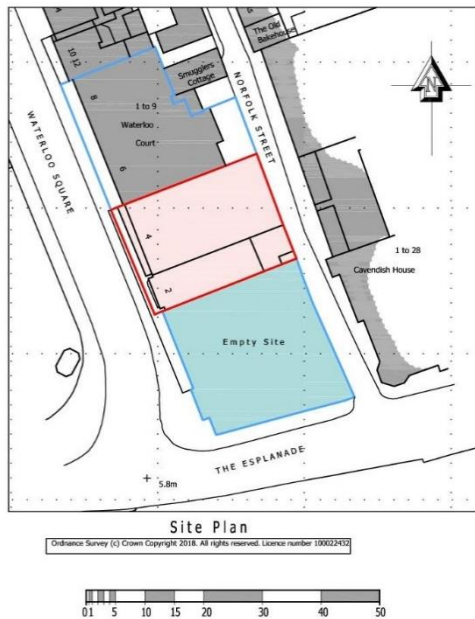
Yes it could be said that there are a number of features on the building such as the Dutch or Flemish gable façade with the pediment are features, but would not say they are “traditional” features in Bognor Regis or for the building, but are more copies of late 16th century Renaissance and later Baroque architecture from Italy. As such the buildings offer little to the traditional character of Waterloo Square and the Conservation Area.

It has also been clearly demonstrated though the H J Concepts Ltd reports dated 21st May and 11th July 2018 that the structure in a number of areas is beyond economic repair and would entail substantial reconstruction to enable the building to be put back into a serviceable use. This by pure reality would result in significant loss of any historic material, being replace with modern 21st Century construction and would be contrary to Policy HER DM2 (d)

It is therefore put that clauses k – m of HER DM3 have been fully met and by association with the pre-enquiry in May 2017, that clause n can be clearly met.

The other clauses a – f would be clearly associated with the redevelopment proposal and should not be a limiting factor for the demolition of the current buildings.

Design Opportunities:



The site and the adjoining site shaded blue have been the subject of a Pre-Enquiry to Arun District Council in 2017, which proposed the demolition of the existing buildings 2-4 Waterloo Square and the construction of 46 No. 2 bedroom apartment dwellings with 600m² of retail/restaurant to ground floor plus with undercroft parking and services.

The proposal was reviewed by both Arun District Council's Planning Team and Design South East with statements from both parties. The proposal carried a number of merits, but also recommended additional work to finalise the proposal. It should be noted that the scheme put forward was in an early design stage and used to gauge comments from key consultees of issues that need concluding. Arun DC comment was *"In principle, there would be no officer objection to the redevelopment of this site or to residential development on the*

upper floors."

This DAS is not intended to recover the Pre-Enquiry, but to purely acknowledge that one has been submitted to Arun DC and reviewed in some depth, with the conclusion that a redevelopment of this *"highly prominent south-west corner of the site presents an opportunity for a landmark architectural feature to contribute to legibility and local distinctiveness."*

Ecology:

An Ecological Survey, Assessment and Biodiversity Checklist has been carried out on the building and separate documents are submitted under the application.

The application for demolition falls outside the Schedule 1 and Schedule 2 projects as defined by the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations) 1999, therefore not requiring an EIA.

Contractors Working hours.

It is proposed to implement the following working hours

Monday – Friday: 08.00am – 18.00 pm

Saturday: – 08.00am – 13.00pm

Sunday and Bank Holidays: – No working

Conclusion

It is concluded that the application for the demolition of 2-4 Waterloo Square (Locally Listed Buildings) is in accordance with the **Arun District Local Plan Local Plan** policies and offers an exceptional opportunity that will improve the vitality of the town centre and provide an enhancement and enrichment for the Conservation Area.

It is felt that no elements of the proposed demolition will have any detrimental effects on the neighbours or local community and businesses with regard to loss of facilities, overlooking or un-neighbourly type of development, and will not harm any wildlife or wildlife habitats.

It can be seen from the photographic evidence that the site at 2-4 Waterloo Square is not in a stable and sound condition and poses a risk to life in this tourist and public domain. The existing structure has many unsympathetic qualities which are detrimental to the conservation area. It has also been clearly demonstrated though the H J Concepts Ltd reports dated 21st May and 11th July 2018 that the structure in a number of areas is beyond economic repair and would entail substantial reconstruction to enable the building to be put back into a serviceable use. This by pure reality would result in significant loss of any historic material, being replace with modern 21st Century construction.