

From: Richard Temple
Sent: 15 January 2018 10:31
To: Planning.Responses
Subject: FW: Objection to planning application reference: BR/194/17/PL

Please scan as representation.

Regards,

Richard Temple | Senior Planning Officer, Directorate of Place, Arun District Council | Location: Phoenix House, Arun Civic Centre,
Maltravers Road, Littlehampton, BN17 5LF
Internal: 37591 | External: +44 (0) 1903 737591 | E-mail: Richard.temple@arun.gov.uk

Please note this information is given without prejudice and represents the informal view of the officer and not an official opinion of Arun District Council.

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Save the environment - think before you print.

From: [REDACTED]
Sent: 15 January 2018 01:46
To: Richard Temple
Subject: Re: Objection to planning application reference: BR/194/17/PL

Dear Mr. Temple,

After a couple of days which didn't go at all as planned, please find attached the supporting document to my objection, giving full details as promised. Such things do take some time, as you'll know.

Thank you for informing me of the date the application is going to Committee. I plan to attend.

So in the meantime, I'll try to speak with you once you've had a chance to look at the attachment.

Sorry to be the bringer of more, rather than less, work.

Sincerely,
Henry

From: Richard Temple <Richard.Temple@arun.gov.uk>
Sent: 11 January 2018 17:18
To: 'Henry Stamp'
Subject: RE: Objection to planning application reference: BR/194/17/PL

Dear Mr Stamp,

A happy new year to you too. I recently saw your name mentioned in the Bognor Regis Post.

I will add your comments to the file. The application is to be considered at planning committee on January 17th 2018 committee.

Regards,

Richard Temple | Senior Planning Officer, Directorate of Place, Arun District Council | Location: Phoenix House, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37591 | External: +44 (0) 1903 737591 | E-mail: Richard.temple@arun.gov.uk
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From: [REDACTED]
Sent: 11 January 2018 17:03
To: Richard Temple
Subject: Objection to planning application reference: BR/194/17/PL

Dear Mr. Temple,

Happy New Year to you!

I write to Object to the above planning application for new toilets and foreshore office on the Promenade as part of the recent re-consultation following changes to the proposals with additional and revised supporting information submitted.

Changes to place the public toilet doors on the southern elevation are welcome. Well done.

My objection is on the following grounds:

- by removal of proposed clerestorey glazing, and the lack of other environmentally beneficial features (like PV on the roof or grey water harvesting for toilet flushing), the new buildings will not add to the achievement of sustainable development;
- the designs are out of context with their surroundings, both buildings on the Esplanade to the north (especially the Esplanade Grande) which will be the backdrop to views from the Promenade, and views along the Promenade by people (including visitors/tourists) walking along the Promenade in both directions westerly and particularly easterly - in the context of other buildings located on the Prom.;
- while each case should be considered on its merits, in the light of the Council's decision to refuse the Sir Richard Hotham Project's second planning application for sites including the nearby Regis Centre Site, for reasons which include " **having regard to the local character and qualities of the area** " with the decision being appealed, it would appear logical to refuse the current application on similar grounds; and

- recent supporting information in the Design and Access Statement and supplementary Planning Statement is wrong, misleading/deceptive, omits relevant factors, and is insufficient for proper consideration of the proposed new buildings; including given National Planning Policy and Guidance, not just local planning policy.

You will know that I didn't respond to the original consultation. This was for several reasons:

- partly because, apart from concerns about the orientation of doors/location concerns, many of those who responded at that time objected on design and aesthetic grounds. Given the volume of such design objections, compared to only one person thought the proposed designs were good, it seemed unnecessary for me to add my voice;

- subsequently, Arun's Head of Economy has been publicly quoted as saying: "The design is modern and contemporary as it will fit in with what we expect to see on the Regis Centre site in future". And the supplementary Planning Statement states: the new building designs reflect emerging concept plans for the Regis Site; and the toilets "will set the quality and design standard of [buildings] that follow". Concern about these points also prompt my objection; and

- only on 11th of last month the revised Design and Access Statement and supplementary Planning Statement were added to the public application file. Having seen the deficiencies of these, in the terms of my objection set out above, they lead me to object at this time.

I will provide further information on the unsuitability of the proposed designs at the earliest opportunity, now I see that the expected decision date for this application is Development Control Committee next week. Probably later today or tomorrow.

Please make Members of the Committee aware of the grounds of my objection and my other relevant observations. I hope that the officer recommendation will be to refuse planning permission, and the applicant be persuaded to re-design to make it in keeping with its context and more sustainable. You will be aware that the applicant is not able to appeal any decision of the Committee. Also, you will know that public bodies are expected to take a lead and do more to assist achieving sustainable development in their actions and projects (e.g. Arun has looked into electric vehicle charging points, which Full Council backed last night); as they should both lead by example and because local authorities have primary responsibility for addressing the future impacts of a changing climate in their localities.

I know that the applicant didn't need to make a planning application for the proposals, which even its detractors (I am impartial, recognising both good and bad ideas) have commended it for doing so. Thus it has a fall-back position of proceeding without a planning permission. However, having looked into this for another case elsewhere, it is not just the existence of a fall-back position that is relevant; but the likelihood that any fall-back will be implemented that has influenced decisions at appeal. As the views of those commenting on the application on aesthetic grounds is overwhelmingly against current plans (only one person supporting them) it seems therefore unlikely that a local authority would proceed in the absence of a permission and of public support. Particularly as temporary toilet provision is to return next season and there is the opportunity for plans to be redrawn (i.e. building without a permission isn't the only option available).

Yours sincerely,
Henry

Henry Stamp. B.A. (Hons.), B.T.P., M.R.T.P.I. (Rtd.)

<http://www.arun.gov.uk>

NLPG UPRN 100062237016

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Planning Reference BR/194/17/PL Seafront Toilets and Foreshore Office, Promenade, Bognor Regis

Information further to e-mail dated 11/1/18 objecting to current proposals from Henry Stamp 14/1/18

This objection supporting document covers the following:

1. Deficient Design and Access and Planning Statements, and contextually inappropriate design
2. Context and design: policy and assessment
3. Consistency of approach to context in decisions
4. Sustainable design, features and policy
5. Fall-back position considerations

1. Deficient Design and Access and Planning Statements, and contextually inappropriate design

The Design and Access Statement is deficient both in what it presents; and the context it fails to recognise. It isn't fit for purpose and so shouldn't be relied upon. As well as omitting relevant factors, it is also misleading / deceptive.

The Design and Access Statement is insufficient for proper consideration of the proposed new buildings; including given National Planning Policy and Guidance, not just local planning policy. It, and the Planning Statement masks a contextually inappropriate design; strongly disliked by the public who have objected to it.

The original Design and Access Statement (DaAS) suggested that the proposed buildings should be considered in the context of the Compass Point flats, being the most modern looking building in the vicinity. This was despite the building nearest to the proposals site being the recently built, award winning, Esplanade Grande flats; as the officer's report recognises. And the next closest buildings on the Esplanade to the site are older flats (with white render and brick) on each side of Esplanade Grande. So Compass Point is three buildings away from the site and thus not the immediate context for the proposals, as objectors have noticed.

Page 13 of the revised DaAS has a large clear photograph of Compass Point, but not of closer buildings to the site on the Esplanade: as if to suggest that Compass Point is the true context. Other objectors have spotted this.

The DaAS states "The new form of the [proposed] building references to the Compass Point and the emerging designs for the redevelopment of the Regis Centre mixed-use site". This selectively identifies just one element of existing context -some distance away- and other designs which haven't even been built yet (being only in concept sketches). These unapproved and unbuilt designs will also be some distance from the site, and so not immediate context. And they may not be built as currently conceived.

Pages 1 & 7 of the revised DaAS contain a purported "Photomontage from the Promenade", not an artist's impression nor a computer generated image. A photomontage should be a photograph with the proposal superimposed.



However, this supposed photomontage is wrong and misleading/deceptive, as other objectors have spotted: saying it “blatantly attempts to deceive”. The white render, white balconies and the honey coloured stone of the Esplanade Grande building has been ‘photo-shopped’: partly turned to grey and partly faded out so it cannot be seen clearly. This misleading image makes the planned buildings’ grey concrete/mineral cladding panels look less out of place/context and less inappropriate than they will really be. Note that the foreground figures/people haven’t been greyed-out: they have normal coloured clothing. Thus the main context for the proposals is shown misleadingly and cannot be relied upon. Even if the intention was to highlight the planned building (as has been claimed); that doesn’t accord with either the photomontage’s caption or the purpose of a DaAS. The photomontage on page 7 does not show, as Space & Place architects claim, “how the buildings will sit on the site”: the site is not correctly shown!

The existing buildings, which will be seen behind the proposal, all have walls of white render (with brick or honey coloured stone) so the context is not grey concrete/mineral cladding panels.

Here is the true context looking east, with the current Foreshore building in the middle foreground; which the DaAS could instead have shown:



From this one is able to envisage how the planned buildings won't fit into this context.

This photograph points to the **major omission of the DaAS: the missing Promenade context for the proposed buildings.**

Many views of the planned buildings will be seen by pedestrians/cyclists going east or west: one of several buildings along the Promenade. These are either white/off-white; or the blue of the bandstand, Arun's three small covered metal seating structures and Promenade seating benches. Even the road lighting columns are ornate and light coloured, reflecting the area's character and history; not the standard plain ones you see on other roads. (There is the approved, non-permanent/mobile Coffee Cup concession, but other concessions have white walls.) Thus the true context can be seen as a procession of bright, mainly white, buildings up to and including the Pier which sit well in their seaside context. (Even further along at West Bognor there are appropriately designed brick shelters constructed by Arun.) These work well together in a harmony which the proposed development will disrupt, even if they are more vernacular (of the people) than architect-designed. They complement the bright seaside character of Bognor seafront.

As Councillor Mrs. Brown has said: "We don't want different styles in different places along the seafront" (quoted in the Observer 31/1/08).

An objector records visitors taking of 'selfie' photos with the award-winning and widely admired Esplanade Grande (not Compass Point) in the background; something which will not happen if the proposals are completed. An objector says the "Esplanade Grande enhances the image of a regenerated resort". And the Bognor Regis Regeneration Board has a photograph of the Esplanade Grande and seafront as its website's homepage; a good indication of what it sees as good about Bognor.

Many objections to the plans included aesthetic grounds, as well as the proposed buildings not being sustainable (an issue addressed below). Objections came from people living close by and further away. Many of these said the design should be more in keeping with the environment in which it is located. Two note the architects' DaAS description of Bognor as a "traditional Victorian seaside town" and so objected to the design spoiling that aspect of Bognor's attraction. The proposals were variously objected to as: an "eyesore"; "hideous eyesore"; "drab, grey blockhouse with a

wavy roof perched on top”; “flag waving designs totally out of keeping with surrounding buildings; “modern and out of character”; “will spoil the look” ; “not in keeping”; should be similar design to buildings on the Promenade at present; “unsightly building”; “ugly”; the existing building is “a far nicer looking structure than the proposed replacement”; the proposals “visually assault the senses”; “concrete block”; “monstrosity”; “out of harmony”; “tinny design”; and “it is apparent that the design does not suit the character of the area”. An objector pointed out that at a public meeting no-one supported the designs. So the DaAS conclusion “By remaining sensitive to the surrounding context, the design allows the buildings to seamlessly incorporated themselves within their immediate surroundings” goes right against the public’s view; and they, unlike the London architects, live here and will have to put up with the “ugly” and “out of character” results. Not “seamlessly incorporated” or “sensitive”.

The DaAS notes the area “consists almost entirely of... brick and render”, but then ignores this in the proposed design. It says the proposed building form “references” a building that hasn’t been constructed or even approved yet (the Regis Centre redevelopment). And it claims the curves are “in keeping” with unspecified architecture somewhere else in Bognor Regis not near the site. The new Planning Statement claims “The [proposed] buildings needed to complement the style of buildings locally... rather than standing out” (page 4). But it is clear this hasn’t been done. Neither is it “an attractive... design” (Planning Statement page 5), or a “high quality” building (page 6).

The Planning Statement rejects faux-Victorian style, implying it is the only option to what is proposed. This is wrong on two counts. Firstly, new buildings on the site don’t have to be faux-Victorian in style to blend in with the local character and not stick out: they could be contemporary but not “ugly” or a “hideous eyesore”. Secondly, it says something about the public’s dislike of the proposed design for an objector to prefer the existing (Arun-designed) foreshore building. And at least “heritage” style would fit better with the buildings and other structures along and beside the Promenade than the proposals.

2. Context and design: policy and assessment

NPPG advises on “The importance of good design” and that “Achieving good design is about creating places, buildings, ... that work well for everyone, look good, last well,...” and “responds... to the identity of a place” (Reference ID: 26-001-20140306, my emphasis). And “Good design should: enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and ...their impact on well being...” (Reference ID: 26-002-20140306, emphasis added).

However it is clear, including from many objections to the application on design and aesthetics grounds, that people don’t think the proposals will look good; nor that that they work for everyone: the wider public and visitors to the town whose views are likely to reflect local people. As NPPG makes clear “**design should not be the preserve of specialists, it is also important to seek the views of local communities.**” (Reference ID: 26-005-20140306, my emphasis). The Planning Statement says that a planning application was made so as to allow public consultation. The Design Chapter of Arun’s latest Local Plan recognises that design affects people’s quality of life and well-being. The proposed design will negatively impact on people’s well-being, which they view as “ugly”. Design should be socially inclusive: considering the public’s views, especially for highly visible public buildings (and take into account the older than average age profile of the town and the corresponding tendency towards more conservative views). The forward to the NPPF says it is about “allowing people and communities back into planning”.

NPPG states that “Planning should promote local character” and “Development should seek to promote character in townscape ... by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.” Also “The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre.” And “Local building forms and details contribute to the distinctive qualities of a place. These can be successfully interpreted in new development without necessarily restricting the scope of the designer. The use of local materials, building methods and details can be an important factor in enhancing local distinctiveness when used in evolutionary local design, and can also be used in more contemporary design.” (Reference ID: 26-007-20140306, emphasis added).

NPPG furthermore states: “A well designed space [place] has a distinctive character Distinctiveness is what often makes a place special and valued. It relies on physical aspects such as: ... building forms; details and materials; style and vernacular...” (Reference ID: 26-020-20140306). Also “A well designed space [place] is attractive The way a place looks... affects its attractiveness and long term success. Composition of elements and the relationship between colours, textures, shapes and patterns are all important...” (Reference ID: 26-021-20140306, added emphasis).

NPPG states: “Consider materials Materials should be practical, durable, affordable and attractive. Choosing the right materials can greatly help new development to fit harmoniously with its surroundings. They may not have to match, but colour, texture, grain and reflectivity can all support harmony.” (Reference ID: 26-028-20140306 (my emphasis)).

The Neighbourhood Development Plan’s policy is relevant: Policy 8a includes “Development Proposals that fail to take the opportunities available for enhancing the local character and quality of the area and the way it functions will not be (permitted) supported. A central part of achieving excellence in design is responding to and integrating with local surroundings landscape and context as well as the built environment through: ~Using good quality materials that complement the existing palette of materials used within the area... ~Innovative design that is sustainable in its design, construction and operation...”.

Policy D SP1 of the new Arun Local Plan says that “All development proposals should be of good quality and demonstrate a high standard of design. Development proposals should have derived from a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity,... attractiveness... and the influence these objectives have on the form of the development. All development proposals must consider... scale, massing, materials, finish, architectural details...”; with “Implementation Through... Development Management decisions” (emphasis added). Paragraph 13.2.2 explains that “The successful introduction of new buildings into established townscapes... relies on... ensuring that ‘new’ buildings are harmonious with their surroundings.” Paragraph 13.2.5. goes on to say that the Council “expects a high standard of design in all planning applications [and] applicants shall ensure that: A comprehensive design process has been carried out including... context appraisal and assessment of relevant policies; involvement with the... local community...”. Paragraph 13.2.6. adds “The design process... should take into account all site context and design issues... ensuring the development is appropriate for the site and area.”. And paragraph 13.2.7 lists several elements of “high quality design” including “Respect, improve and enhance the existing surrounding environment; Be attractive in appearance, responding to the local context but receptive to... innovation in construction techniques...” (my emphasis).

The NPPF has a section on “Requiring good design” and says: “Good design... should contribute positively to making places better for people” (NPPF 56). It also states: “Planning... decisions should aim to ensure that developments: ~ will... add to the overall quality of the area,... ~ respond to local character and history, and reflect the identity of local

surroundings and materials,... and ~ are visually attractive as a result of good architecture...” (NPPF 58). NPPF paragraph 60 says “It is... proper to seek to promote or reinforce local distinctiveness.”

The officer’s report identifies saved policy GEN 7 and gives the relevant text about “responds positively to the identified characteristics... of the site and the area to create places and spaces with the needs of people in mind and respects and enhances local distinctiveness”.

From the above various sections of local and national planning policy, it should be apparent that the current proposed design is entirely inappropriate for its context. This is particularly the case when the site’s context has been correctly identified, and not presented in a misleading way (as 1. above). While its scale is no larger than the building it will replace; its form, materials, detailing and look make it completely out-of-character and wrong for its setting. As some 30 objections have recognised; and those views are valid considerations. It should not be difficult to design toilets and a Foreshore office that relate well to the site’s surroundings: such a design doesn’t have to be ‘heritage’ looking, but reflect the seaside character of the town. Also, something which looks elegant and attractive to the general public and the visitors we want to come here, stay longer, and visit more than once. The current proposal looks as if it belongs as an out-of-date toll booth office and facilities block to some road tunnel somewhere, not the promenade of **Sussex by the Sea. It looks more Dartford Tunnel or Tyne Tunnel than Bognor Regis seafront. It will adversely affect the visual amenities of the locality and the established character of its surroundings. The inappropriateness includes the wavy roof form -see also 5. below regarding Roof form: sustainability and design issues.**

3. Consistency of approach to context in decisions

While each planning application has to be considered on its merits, Members might wish to ensure that consistency in decision making is demonstrated. The reason for refusal of the Sir Richard Hotham Project’s second application (BR/156/16/PL) was: “The positive aspects of the proposed development are not considered to outweigh the failure of the development to demonstrate sufficient design excellence having regard to the local character and qualities of the area and the aspiration for the regeneration of the seafront and the town as a whole.” (emphasis added). It would appear consistent to take the same approach to the current planning application as, at least in the public’s view, the design doesn’t have regard to the qualities and local character of the area that is the site’s context. And it is far from being an excellent design.

4. Sustainable design, features and policy

NPPG states: “Planning should promote efficient use of natural resources The ... design of places can help reduce their resource requirements in terms of energy demands, water ...” and “The layout and design of buildings... can reduce energy and water use... and mitigate against... over heating.” Heat gains “can be reduced by, for example,... shading... and using light and reflective surfaces... on buildings. (Reference ID: 26-013-20140306).

The plans don’t use light and reflective surfaces, which the white render on nearby buildings provides. And the proposals have gone backwards in terms of efficient use of natural resources and reducing energy use: the clerestory glazing, which would have let natural light into the buildings, has been removed as part of recent design changes. This should be put back and natural light into the buildings maximised.

NPPF paragraph 14 says “At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.”.

Neighbourhood Plan Policy 8a, as part of excellence in design, seeks “innovative design that is sustainable in its design, construction and operation”.

Policy D SP1 of the new Arun Local Plan states “All development proposals should... demonstrate... adherence to objectives informing sustainable design... [including] climate change mitigation ...” (my emphasis).

Policy ECC SP2 of Arun’s new Local Plan says: “All new... development... will be expected to be energy efficient and to demonstrate how they will... a. Achieve energy efficiency measures [to Part L]... and c. Incorporate decentralised, renewable and low carbon energy supply systems, for example small scale renewable energy systems such as solar panels.” (emphasis added). Implementation of this policy includes “delivering holistic design of new development... and Arun District Council Development Management”. And paragraph 13.5.11 says the “West Sussex Sustainable Energy Study has identified... a range of sources, including... solar photovoltaic, solar water heating...”.

For the toilets and Foreshore office, solar water heating could help provide hot water for taps, and photovoltaic (PV) could help power lighting, heating etc.. Paragraph 13.5.14 of the Local Plan mentions ADC’s commitments to mitigate the impacts of climate change under Climate Local; so one would expect Arun as the applicant to take action to mitigate climate change. Also, Bognor has a good sunshine record and the site is south facing and with full sun to east, south and west (i.e. not shaded/overshadowed by other buildings). So there is great potential here for solar heating and PV; plus for Arun to be innovative and show off its faith in the sunshine that attracts visitors, and people to move here.

Policy ECC SP1 of the new Arun Local Plan states: ...”development must be designed to take account of... b. Water efficiency” and implementation of this is “...through Arun District Council Development Management” (my emphasis). For this application, this is more than just water saving taps and toilet flushing: harvesting rainwater e.g. for toilet flushing would save rainwater being drained to water treatment works before being returned as drinkable quality water -for flushing down toilets. This would be significant water efficiency and reduce water demand.

5. Roof form: sustainability and design issues

The plans show a roof form that is completely out of character with the site’s context. As some other objections have pointed out, it will be attractive to seagulls perching and roosting; with the mess/’poop’ they make, including over the roof edge onto the Promenade’s surface. This is far less of a problem when roofs have a ridge, where it tends only to be an issue at gable ends. Hipped or gabled roof forms eliminate this end-of-ridge perch and mess near building edges. It would reflect poorly on the applicant if, after completion of the proposed design, anti-bird netting had to be erected over the roofs.

Additionally, roof slopes would assist the generation of solar hot water and PV.

6. Fall-back position considerations

There is a fall-back position of development proceeding without a planning permission. However, having looked into this for another case elsewhere, it is not just the existence of a fall-back position that is relevant; but the likelihood that any fall-back will be implemented that has influenced appeal decisions. As the views of those commenting on the application on aesthetic grounds are overwhelmingly against current plans (only one person supporting them) it seems therefore unlikely that a local authority would proceed without permission and without public support. Particularly as temporary toilet provision is to return next season and so there is the opportunity for plans to be redrawn (i.e. building in the absence of permission isn't the only option available).

I am a Bognor resident, born here. I don't live very close to the site, but pass it frequently.