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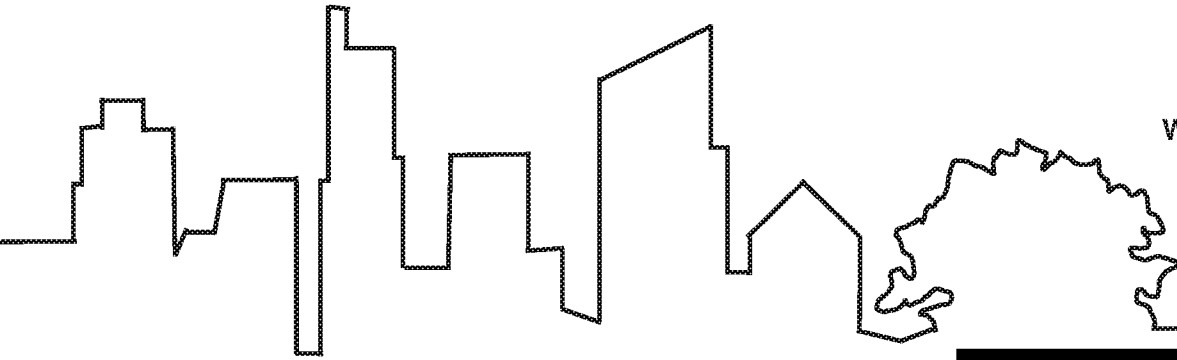
Planning Statement

Portal Ref: PP-07179935

Ashley House,
120 Aldwick Road,
Bognor Regis
P02 2PB

Part two, part three storey extension relocation of bin store and new cycle stores

AUGUST 2018



Walsingham Planning
Bourne House
Cores End Road
Bourne End
Buckinghamshire



INDEX

1.0 INTRODUCTION

2.0 SITE & SURROUNDINGS

3.0 PLANNING POLICY

4.0 PLANNING HISTORY

5.0 PROPOSAL

6.0 CONSULTATION

7.0 ASSESSMENT

8. 0 CONCLUSIONS

Appendix – Exchange of email correspondence

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1.0 INTRODUCTION

1.1 This statement accompanies the application seeking full planning permission for a part two, part three storey extension to Ashley House in order to increase the amount of HMO accommodation available for team members at the Butlins resort.

1.2 The application package comprises:

- Completed application forms, certificate A
- The planning fee of £3696 has been paid online.
- Plans 170/3/001 Rev 03, 002 Rev 04, 003 Rev 02, 101 Rev 05, 102 Rev 06, 103 Rev 02, 201 Rev 05, 202 Rev 05
- CGI views of proposal
- Planning Statement by Walsingham Planning
- Design & Access Statement by Randell Design Group
- Statement re HMO standards by Michele Glazebrook
- Noise Impact Assessment by RBA Acoustics
- Transport Statement by Systra
- Travel Plan by Systra
- Butlins Ashley Home Management Plan

2.0 SITE & SURROUNDINGS

- 2.1 Ashley House was previously used as a care home but is now in use as an HMO providing accommodation for Butlins team members
- 2.2 Ashley House has a section understood to date from the 19th century which presents a red brick façade with tower, pitched roof and dormers to the front elevation but which has a much larger modern two storey flat roofed extension to the side and rear.



- 2.3 There are 2 storey Victorian cottages to the south east and a large nursing home to the north.



“View looking north west along Aldwick Road beyond site”

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“View looking south east along Aldwick Road beyond site”

- 2.4 There are 3 storey modern flats opposite the site other side of Princes Avenue.



“3 storey flats opposite the site”

- 2.5 There is a very limited parking and vehicle manoeuvring area at the front of the property with a single access off Aldwick Road.

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B0128/18 Ashley House, 120 Aldwick Road, Bognor Regis, PO21 2PB – Planning Statement

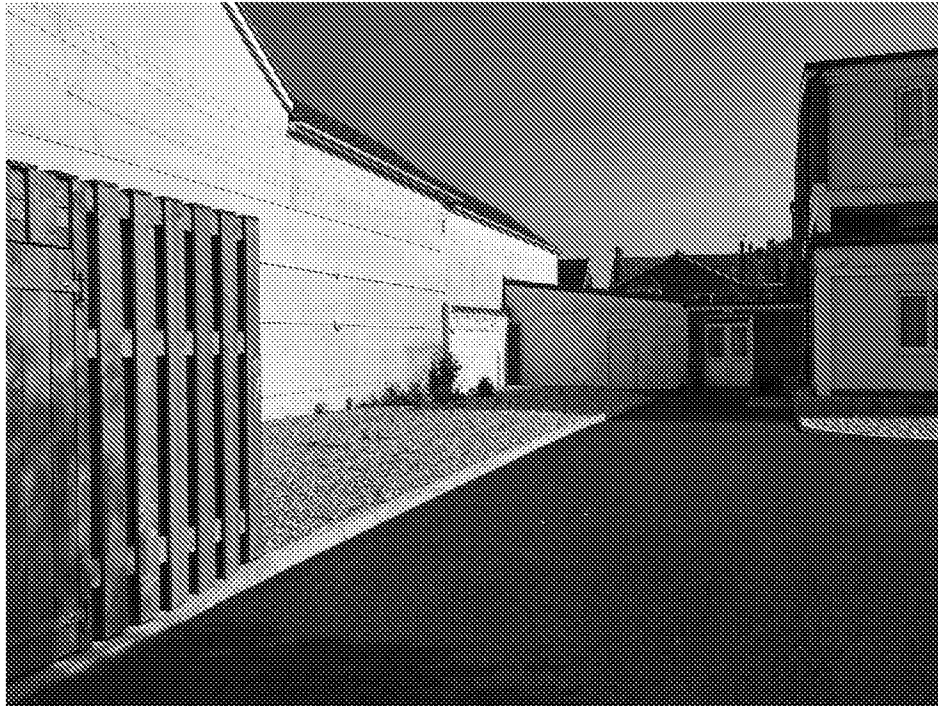


“Paved parking and manoeuvring area”

- 2.6 Adjacent to the hard surfaces area there is a bin store and unused gravel area against the north western boundary which comprises the blank two storey wall to the adjoining nursing home.



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“Blank 2 storey wall on north west site boundary”

- 2.7 There is a narrow service road to the rear, north eastern boundary of the site that provides service and garage access to same Aldwick Road and Richmond Avenue properties. Garages to the Richmond Avenue properties and then the dwellings lie further beyond the service road to the north and north east.

3.0 PLANNING POLICY

NPPF

- 3.1 A new NPPF was published on 24th July 2018. This carried forward similar advice to the 2012 version with regard to the application proposal.
- 3.2 Councils are now urged to take a “positive and creative” approach to decision making, working pro-actively with applicants seeking to “approve applications for sustainable development where possible” (para 3a). The presumption in favour of sustainable development remains “at the heart of the Framework” (para 10).
- 3.3 Para 61 seeks to ensure that the whole range of housing need groups are catered for. Paras 102 et seq, para 110 in particular, encourage proposals that support the use of alternative modes of transport and use of Travel Plans. Paras 117 et seq strongly encourage the most effective use of land.
- 3.4 Paras 124 et seq encourage a high quality of design. Potential impact of proposals on non-designated heritage assets is dealt with in para 197 requiring a balance of judgement having regard to the scale of any harm or loss of significance.

Local Plan (2003)

- 3.5 The site is without specific notation on the Proposals Map and is not within or close to a Conservation Area. It is clearly well within the built-up area of the town.
- 3.6 Policy GEN7 seeks *inter alia* generally high standards of design and efficient use of land that avoids any adverse impact on neighbouring uses.
- 3.7 Policy GEN32 seeks to ensure that new development does not give rise to noise disturbance to neighbouring uses
- 3.8 Policy DEV19 seeks to allow residential extensions provided that the design is good, subservient to the host building has no adverse impact on neighbours, does not result in “terracing” or compromise the street character.

Emerging Local Plan

- 3.9 Policy DDM1 seeks to promote good design including densities for new housing that make efficient use of land and that the scale of proposals should be appropriate for context
- 3.10 Internal space standards are set out in policy DDM2 but there is no standard for HMO’s (as in the current proposal), similarly, the external space standards in DDM3 do not refer to HMO’s

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B0128/18 Ashley House, 120 Aldwick Road, Bognor Regis, PO21 2PB – Planning Statement

- 3.11 Policy DDM4 specifically seeks good design for extensions to existing buildings including sympathy with the surroundings and subservience to the host building as with policy DEV19 above.
- 3.12 Good sustainability credentials are sought under policy ECC SPZ to Building Regulations standards or Code for Sustainable Homes or BREEAM.
- 3.13 Policy QE DM1 seeks to ensure that new proposals do not give rise to noise disturbance to their neighbours.
- 3.14 Policy T SP1 seeks to ensure that the transportation needs of proposals do not give rise to safety or capacity issues.
- 3.15 Policy HER SP1 seeks to provide generalised protection for the historic environment.

4.0 PLANNING HISTORY

- 4.1 The planning history of principle relevance to the current proposal is the 2016 application for change of use of Ashley House from C2 care home to a House in Multiple Occupation for Butlins team members.
- 4.2 Permission was granted under reference BR/100/16/PL on 10th August 2016. Conditions on the permission made the approval personal to occupation by Butlins team members, imposed noise limitation measures (eg “quiet time” of 22.00 – 07.00), implementation of a Travel Plan, imposition of a requirement for occupiers to sign an Accommodation Agreement and adherence to the submitted Ashley House Management Plan.
- 4.3 In their reports to Committee officers found the principle to be acceptable, that the scheme complied with policy and that highways and amenity issues would be dealt with by conditions.
- 4.4 In particular, officers concluded that the internal and external space standards in the emerging Local Plan were inapplicable. Instead, reference was made to the Council’s own Housing Standards and Landlord Accreditation Scheme. The Council’s Environmental Health Officer raised no objections to the scheme on the basis of these standards.
- 4.5 Officers concluded “it is not considered that there are any policies within the NPPF that would restrict this development proposal. Furthermore, the analysis above demonstrates that there are no significantly adverse impacts associated with the proposed change of use that outweigh the benefits that the scheme will bring in respect of sustainability”.
- 4.6 Conditions relating to external materials, Construction Management, external lighting and The Travel Plan were subsequently discharged.

5.0 PROPOSAL

- 5.1 Details of the proposal is described in greater detail in the accompanying Design & Access Statement.
- 5.2 Ashley House is now in use as an HMO accommodating Butlins team members. It is proposed to extend the number of bedrooms and kitchens so that up to 30 additional members of staff would be accommodated on site.
- 5.3 There are already generously provided lounge/living rooms within Ashley House which are not fully used so it is not proposed to provide any extra space of this kind.
- 5.4 Full details of the room sizes are given in the accompanying Design & Access Statement, the scheme provides:

	Bedrooms	Kitchens
Ground Floor	6	1 (double)
First Floor	6	1 (double)
Second Floor	3	1

- 5.5 The extension comes close to the site of the current bin store so this is moved to the opposite side of the access. The existing bins store capacity is sufficient for the greater number of residents.
- 5.6 An existing outbuilding fronting onto the service road at the rear of the site is to be demolished. Two new bicycle shelters for 14 and 26 cycles are proposed.
- 5.7 The existing turning and vehicle manoeuvring area is only very marginally impacted on one side and remains fully functional.
- 5.8 The extension is close to the blank boundary wall to the adjoining property. The applicants will ensure that the neighbouring property is not adversely affected by the works.
- 5.9 No attempt has been made to mimic the style of the adjoining care home or Victorian cottages on either side of the site, nor indeed the functional existing two storey extension to the original Ashley House. The design is intended as a contemporary reflection of its context that utilises a mansard roof to minimise impact.
- 5.10 There is no additional car parking.

- 5.11 Team members accommodated in the extension will be governed by the same Management Plan as those in the existing building and will be required to agree to the same Tenancy Agreement.

6.0 CONSULTATION

- 6.1 The previous application for Ashley House back in 2016 attracted considerable public interest. Indeed, there was a significant level of objection to the scheme.
- 6.2 The applicants believe that successful management and operation of the site should have allayed those previously expressed concerns.
- 6.3 A public exhibition of the current scheme was held on Thursday 26th July 2018 at Ashley House when the Butlins resort General Manager, Jeremy Pardy, made himself available to answer any questions and queries about either the current or proposed operations.
- 6.4 The applicants sent invitations to the exhibition to a total of over 500 households including 97-133 (odd) Aldwick Road, 90-152 (even) Aldwick Road and 1-29 Richmond Avenue.
- 6.6 The event was attended by only 4 people, none of whom raised objection to the scheme.
- 6.7 The number of attendees was disappointing, but, given the significant level of objection to the original application a well attended public meeting at that time and that Butlins contacted all of those that objected back in 2016 the applicants regard this very low level of attendance and complete lack of objection as a very positive sign that neither the current operation nor the proposed extension has given rise to any concerns.
- 6.8 The applicants have also separately contacted the owners of the adjoining Care Home at nos 124-128. The owners have expressed concern about possible impact upon their boundary wall and requested a separation. The applicants have acknowledged those concerns and will ensure that the new wall is constructed in full accordance with any Building Regulations or other requirements as an independent structure but it is impractical to provide the separation requested as this would reduce the vehicle manoeuvring. A copy of the email exchange is attached hereto at Appendix 1.

7.0 ASSESSMENT

Principle

7.1 The proposal comprises residential development of a site within a predominantly residential area within the confines of the town, close to shops and other facilities that also enjoys a good bus service along Aldwick Road (described as “excellent” in the accompanying Travel Plan).

7.2 There should be no objection to the principle of residential development at the site.

Type of Accommodation

7.3 The proposal follows the same HMO model of ensuite bedrooms that have shared kitchen and lounge spaces as approved at Ashley House.

7.4 The proposed new bedrooms have similar sizes to those approved in Ashley House. The applicants HMO advisor has provided the accompanying detailed report to support the application. This examines the position under both existing and emerging regulations. The report concludes that ...“the completed property will be fully compliant with both national and local standards” ...

7.5 It is proposed to operate the extension in the same manner, with the same strict controls in place as at Ashley house.

7.6 The same Management Plan and Accommodation Agreement as previously approved and enforced by a planning condition are submitted herewith and the applicants are equally willing to accept similar conditions on any new permission to impose the same range of measures to ensure the current manner of occupation and good practice continues.

7.7 Residents in the extension will be able to access the lounges in Ashley House without going outside as the scheme includes a link corridor.

7.8 The accommodation is of a high standard for the type and helps to widen the range of housing available in the town. NPPF encourages provision of a range of accommodation at para 61 and the provision of housing for Butlins team members is a specific local requirement.

7.9 The proposal also assist the Council in meeting the housing requirements of the District by making best use of the currently unused part of the site relieving pressure on other uses favourably located housing sites. This helps to make best use of land as encouraged by NPPF paras 117 et seq.

- 7.10 The Ashley House operation has demonstrated itself to be a good neighbour and a successful means to meet a specialised niche in housing demand in the town. With continued additional demand in that specialised sector the proposal is a proven successful means to meet demand and relieve pressure on other forms of accommodation.

Internal & External Space

- 7.11 At the time of the 2016 permission officers accepted that the style of accommodation is not within the definition of “flats” for the purpose of open space standards. Whilst the current proposal reduces external open space on the site the area concerned has not been used for amenity purposes and it remains the case that the site is within an easy, short, walk of Marine Park Gardens, West Park and the beach. On those bases and bearing in mind the nature of the occupants (eg no families with children) there is very limited need for external open space.
- 7.12 It is the advice of the applicants HMO advisor that the proposal not only meets current but also anticipated internal space standards. The proposed rooms are similar in size to their equivalents in the current, permitted, scheme. On those bases the proposal provides acceptable levels of internal space.
- 7.13 The emerging Local Plan includes standards for internal and general space but officers accepted in the 2016 application that these were inapplicable and that more general housing standards should be applied. The scheme meets those standards. The popularity of the accommodation with Butlins team members also strongly indicates acceptability of the facility from a user’s point of view.

- 7.14 The proposal provides an acceptable level of internal and external space.

Highways & Transport

- 7.15 The “no car” policy applied at Ashley House will be equally applicable for the extension. The policy has worked well and there is no reason why it should be any less successful going forward.
- 7.16 At the exhibition on 26th July 2018 no objections were raised regarding parking or transport issues.
- 7.17 As promised in the 2016 application the applicants provided a shuttle bus for use by the team members. However, this fell into dis-use after 4 weeks as it was only being used by 5 members of staff. It remains available if there is a demand for its use.

- 7.18 The accompanying Transport Statement concludes that the site is in a sustainable location and that the proposal accords with relevant policies on parking provision and carbon emission reduction. Experience from Ashley House and successful implementation of Travel Plan measures demonstrate that there will be no significant increase in trips to the site.
- 7.19 The accompanying Travel Plan repeats the successful measures from the 2016 approval.
- 7.20 There was a strong uptake of the bike loan scheme offered by Butlins as part of the 2016 approval and it is hoped this will continue for new residents in the extension. But the existing cycle storage has proved to be more than adequate so will be retained at the same level to accommodate 40 cycles.
- 7.21 There will be only minimal changes to servicing requirements at the site as a result of the proposal, insufficient to give rise to any adverse impact or require any change.

7.22 The proposal is acceptable from a transportation point of view.
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Noise & Operational Matters

- 7.23 At the exhibition on 26th July 2016 there were no objections raised in relation to noise. Throughout the whole period of operation of Ashley House there have been only 2 complaints received. One related to parking and was immediately resolved, the other related to the landscaping and was also addressed.
- 7.24 A new Noise Impact Assessment (NIA) accompanies this application and has the benefit of being able to measure noise from the current operation.
- 7.25 As set out para 7.6 above the same Management Plan and Accommodation Agreement as are currently in place will be applied to the extension.
- 7.26 The NIA assesses potential noise from movements to and from the site, noise within rooms and external noise. These are all shown to be at levels that would not give rise to any materially adverse impact. Indeed, the extension is expected to reduce noise for the adjoining care home as it will act as a barrier.

7.27 The NIA recommends imposition of the same controls as were imposed on the original approval and that even “worse-case assumptions” give rise to impacts that ...“will be minimal and should not adversely affect nearby residents” ...

Neighbour & Streetscene Impact

- 7.28 The extension abuts a blank boundary wall and “faces” inwards toward its host building.
- 7.29 There is no overlooking of the adjoining care home as no windows face in that direction even at 2nd floor level where the mansard projects above the boundary wall.
- 7.30 Beyond the boundary wall within the site of the care home there is a large rear extension so that even the presence of the mansard at a high level will have no material impact and will not be visible from any windows.
- 7.31 The front elevation of the extension respects the building line of the adjoining property and presents a well proportioned facade of domestic scale. The 6 front bedroom windows are separated from flats opposite by Aldwick Road and a distance of c. 25m similar to all of the other opposing windows in the street.
- 7.32 The rear elevation has 2 ground floor and 3 upper floor windows that face toward the service road but these are set back from the boundary and c. 30m from the rear elevation of the houses in Richmond Avenue.
- 7.33 The imposition of “quiet times”, non-use of the external space after 22.00 and absence of any car parking all help to make Ashley House and the proposed extension perfectly acceptable neighbours.
- 7.34 Design and scale of the proposal are well suited to the context and the materials have been selected to be compatible with the surroundings.
- 7.35 The proposal will have no materially adverse impact on neighbour amenity or the character and amenity of the streetscene.

Heritage

- 7.36 The 2016 officer report on the previous application identified Ashley House as an undesignated heritage asset as it is a “redbrick building with attractive crenelated tower feature” that appears in the 1897-98 mapping as “Arthurs Home (Convalescent)”
- 7.37 The significance of the undesignated asset has been diminished by the existing unsympathetic modern extensions.
- 7.38 Any significance is limited to the appearance of a small part of one façade and the historical tie back to its former use
- 7.39 The current proposal will not harm the significance of the asset.

- 7.40 NPPF para 197 sets out that a balanced judgement should be made in deciding any application proposal taking into account the scale of harm or loss of significance. In this instance there is no harm or loss of significance so that the balance is in favour of the grant of permission.

7.41 The proposal is acceptable from a heritage point of view.

Planning Policy

- 7.42 It is unconventional to put an analysis of policy at the end of an assessment but this reflects the acceptability of the principle of the proposal and nature of detailed consideration of the scheme.
- 7.43 The proposal provides policy compliant sustainable development that widens the range of housing in the town by making best use of an existing developed site. The proposal fully complies with NPPF.
- 7.44 The site is within the urban area and as set out above utilises good design appropriate to its context and there are tried and tested measures proposed to be put in place to minimise any potential for noise or disturbance thereby meeting Local Plan policies GEN7.32 and DEV 19.
- 7.45 Similarly, the proposal meets emerging policy DDM1 by utilising good, appropriate design and the proposed Management measures will ensure compliance with policy QE DM1 to protect neighbour amenity.
- 7.46 By continuing the “no car” policy and making a suitable bus available the proposal meets emerging policy TSP1 to minimise transportation. Impact.
- 7.47 Officers confirmed that emerging policies DDM2 and DDM3 are inapplicable at the time of the 2016 application and there is no reason to change this analysis.
- 7.48 The proposal will fully comply with Building Regulations and meet emerging policy ECC SP2.
- 7.49 The absence of any adverse impact on the (limited) significance of what the Council regard as an undesignated heritage asset means that emerging policy HER SP1 is also complied with.

7.50 The proposal complies with NPPF, adopted and emerging policy and represents sustainable development to which the presumption is favour of granting permission should apply.

8.0 CONCLUSIONS

- 8.1 The public exhibition of the proposal demonstrated that the fears expressed by most objectors at the time of the 2016 have not been realised and that the current Ashley House operation has performed as a good neighbour.
- 8.2 The proposal is to extend the current Ashley House accommodation in a well designed scheme fully appropriate to and sympathetic toward its context.
- 8.3 It is proposed to extend all of the successfully implemented controls in place for Ashley House to the extension so that the good relationship which has been built up can continue.
- 8.4 The applicants are happy to accept the same restrictions that have been successfully imposed by conditions on the 2016 permission on this current proposal with the same conditions.
- 8.5 The scheme has no materially adverse impact upon neighbours, the streetscene or the (limited) significance of undesignated heritage asset.
- 8.6 The scheme performs a very useful role in helping to meet a niche housing requirement in the town and support a major employer and economic driver for the area.
- 8.7 Planning permission should be granted.