

PLANNING SUPPORT STATEMENT

In relation to:

***'Notification for Prior Approval under Class O
for change of use from office use (Class B1a)
to residential (Class C3) - Conversion of
existing office building into 15 x No. self-
contained residential units'***

**Knighton Chambers, 39-41 Aldwick Road,
Bognor Regis, West Sussex, PO21 2LN**

September 2020

PLANNING SUPPORT STATEMENT

I. INTRODUCTION

- 1.1 Rodway Planning Consultancy Limited has been instructed by Star Property Investments, to submit a Prior Approval application for the change of use of an existing office block building (Class B1 a) to form 15 studio units (Use Class C3).
- 1.2 It is noted that permitted development rights have been introduced under Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development Order), 2015 (GPDO) (as amended) to allow the change of use of a building and any land within its curtilage from use as offices to a use falling within Use Class C3 (dwelling house) of the Schedule to the Use Classes Order.
- 1.3 It also provides for deemed consent for works reasonably necessary to convert the buildings to residential use. Importantly, it is noted that the building must not exceed 465 square metres of floor space and applies up to a maximum of 5 No. dwellings being developed.
- 1.4 This application is accompanied by the following drawings and supporting documents:-
- 2.01 Location and Block Plans, prepared by George Baxter Associates
 - PL21 Ground Floor Plan as proposed, prepared by George Baxter Associates
 - PL22 First Floor Plan as proposed, prepared by George Baxter Associates
 - PL23 Second Floor Plan as proposed, prepared by George Baxter Associates
 - 2.05 Front and Side Elevations as proposed, prepared by George Baxter Associates
 - 2.06 Rear and Side Elevations as proposed, prepared by George Baxter Associates
 - 2.07 Site Plan as proposed, prepared by George Baxter Associates



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2.0 SITE DESCRIPTION

- 2.1 The existing building (No. 39-41 Aldwick Road) is two-storeys with accommodation in its roofspace served by dormers. It is situated on a corner plot, fronting onto Aldwick Road, and Victoria Road South to its east side.



Fig 1. Aldwick Road elevation (courtesy of Google Maps)

- 2.2 The property is located outside, and to the west of Bognor Regis town centre. Aldwick Road has a number of commercial premises, including a parade of shops further to the west. The coastline and beach at West Bognor lies a short distance to the south.



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Fig 2. Aerial plan of Knighton Chambers (courtesy of Promap)



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3.0 PLANNING HISTORY

3.1 According to the Council's online records, the premises has the following relevant planning applications relating to it:

- **BR/186/48** - Change of use from hotel and restaurant to offices and restaurant – Approved 13th January 1949
- **BR/186/48/C** - Use of offices and restaurant for electro therapist chiropody and masseur – Approved 31st August 1949
- **BR/186/48/D** - Use of offices as a consulting room for doctor of psychology – Approved 31st August 1949
- **BR/186/48/E** - Use of room as hair stylist consultant – Approved 8th October 1951
- **BR/186/48/G** - Change of use of 4 rooms on 2nd floor from residential flat to offices – Approved 10th July 1957
- **BR/412/68** - Change of use from restaurant to Estate Agents Office – Approved 9th September 1968
- *(BR/100/93/B - Proposal Alterations to form 7 self-contained office suites – Building Regulations passed 23rd June 1993)*
- **BR/173/01** - Change of use from office (Suite 4) to osteopathy clinic – Approved 25th July 2001
- **BR/151/20/CLE** - Lawful development certificate for the existing office use as B1(a) – Approved 3rd September 2020





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4. PLANNING CONSTRAINTS & DESIGNATIONS

- 4.1 The Arun District Local Plan Policies Map (see **Fig 3** below) confirms that the site lies within the built-up area boundary, and it also identifies that the premises is within the Conservation Area.

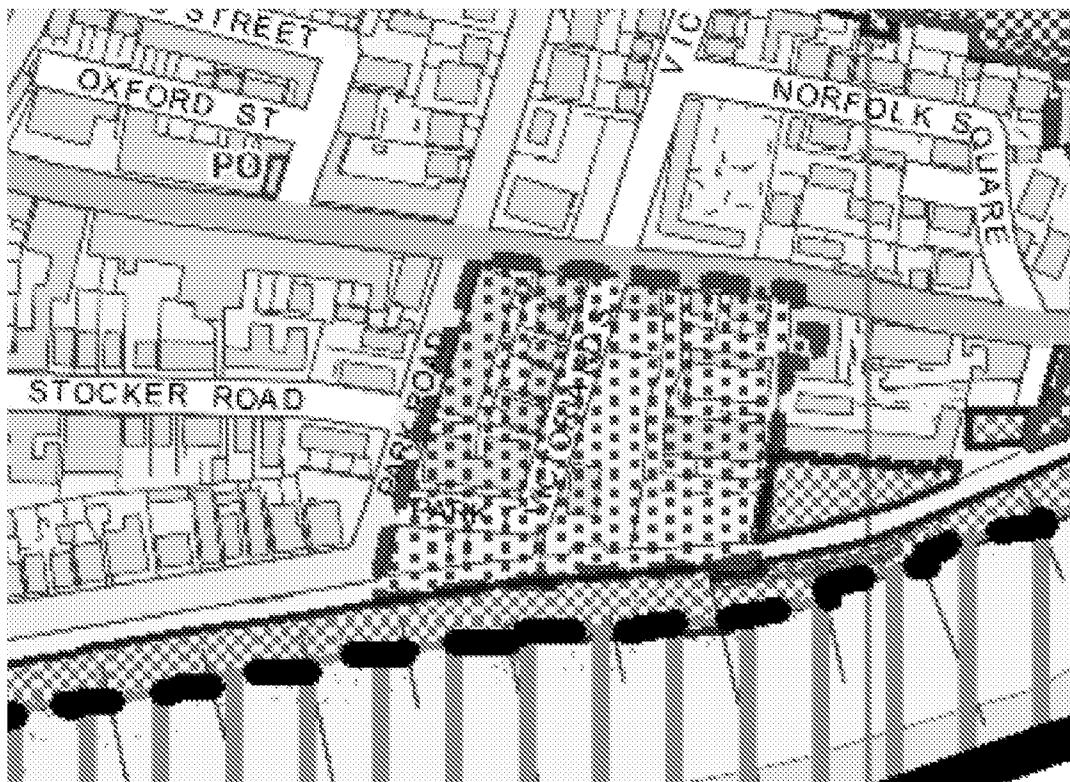


Fig 3. Extract of Arun Policies Map 3: Bognor Regis & Surrounding Area

- 4.2 The Environment Agency online flood map for planning (see **Fig 4** below) confirms that the site does not lie within an area identified as being at risk of flooding (i.e. flood zones 2 and 3). The premises is not a listed building, but it is noted that it lies opposite a listed building (No.37 Aldwick Road – to the east), and separately the southern garden wall of this property (both indicated by dark blue symbols on the Historic England online map extract at **Fig 5** below). Both of these structures are Grade II Listed.



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- 4.3 The property does not have any planning conditions removing permitted development rights. We are not aware of any Article IV Direction on the property removing permitted development rights for Class O i.e. B1(a) office to C3 residential.



Fig 4. Environment Agency flood map



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Fig 5. Historic England online Listed Building map



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5. THE PROPOSAL

- 5.1 This application seeks prior approval for the conversion of the existing 2½ storey office building to a residential use comprising a total of 15 units of accommodation.
- 5.2 The units will all be of various size, but will all be studio type dwellings. There will be 6 units at ground floor, 7 units at first floor, and 2 units at second floor level.
- 5.3 The proposal will involve no extensions or significant alterations to the building. Externally the building will not appear materially different to existing.
- 5.4 This Prior Approval submission is accompanied by drawings which detail the development proposals.



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6. ASSESSMENT AGAINST PERMITTED DEVELOPMENT CRITERIA

- 6.1 This is a Prior Notification Application for the conversion of an existing building in office use (B1a) to a residential use comprising a total of 15 studio units under Part 3, Class O of The Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2015.
- 6.2 For the purposes of clarification, the legislation is listed below in full, together with our notations relating to the development proposal.

“Permitted development

Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class B1(a) (offices) of the Schedule to the Use Classes Order, to a use falling within Class C3 (dwellinghouses) of that Schedule.

Development not permitted

O.1 Development is not permitted by Class O if—

(a) the building is on article 2(5) land;

Article 2(5) land are specific business areas as set out in the GPDO. We are not aware of any such areas identified for Arun District.

(b) the building was not used for a use falling within Class B1(a) (offices) of the Schedule to the Use Classes Order—

(i) on 29th May 2013, or

(ii) in the case of a building which was in use before that date but was not in use on that date, when it was last in use;

The building has been in office use (B1a) for the qualifying period set out.

(c) the use of the building falling within Class C3 (dwellinghouses) of that Schedule was begun after 30th May 2016;

Not applicable.

(d) the site is, or forms part of, a safety hazard area;

Criteria met. The site does not form part of a safety hazard area.

(e) the site is, or forms part of, a military explosives storage area;

Criteria met. The site does not form part of a military explosives storage area.

(f) the building is a listed building or is within the curtilage of a listed building;

Criteria met. The building is not listed, and nor does it lie within the curtilage of a listed building.

(g) the site is, or contains, a scheduled monument.

Criteria met.

Conditions

O.2.—(1) Development under Class O is permitted subject to the condition that before beginning the development, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to—

a) transport and highways impacts of the development

Car Parking

Although the application site is not provided with any allocated car parking that would serve the new residential units, it must be remembered that the existing building is in office use (B1a), totalling 465 sqm including communal space.

The WSCC document entitled 'Guidance on Parking at New Developments' (2019) identifies that an office building of this size would be expected to have a parking



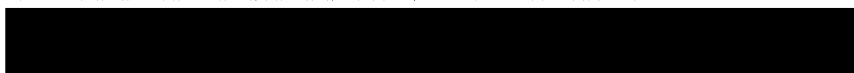
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demand of at least 15 spaces (1 space per 30 sqm). Currently the site is provided with nil parking spaces, and an assessment of the site clearly confirms that there is no ability for this to change. Given the constraints and size of the application site, the proposed residential units would be provided with nil parking also. However the WSCC document identifies that the site lies within 'Parking Behavioural Zone 4', and in such locations residential units that have 1-3 habitable rooms, as is the case here, have a parking demand of 0.9 spaces per unit. In this case, this results in a parking demand of 13.5 spaces – which is less than that which would be required to serve the existing office use at the site. Therefore, it is clear that the proposed residential use will not lead to a materially increased parking demand over and above that existing at this site. Indeed, it is instead likely the parking demand emanating from the use of the site will actually be reduced.

It is noted that surrounding streets do have some capacity for unrestricted on-street car parking, for instance on Victoria Road South (to the immediate east of the site), and Victoria Road itself to the north. Additionally, there is also a relatively large car park opposite the site on the corner of Victoria Road and Aldwick Road, which appears to have capacity for circa 33 parked cars. Given the proximity to the subject property, it is reasonable to say that future residents would have a range of parking opportunities in the immediate area, despite on-street restrictions on Aldwick Road itself. There is clear capacity available within the immediately surrounding area for parking spaces to serve the proposed development.

Sustainable Travel & Proximity to Services

It is generally accepted that walking and cycling provide important alternatives to the private car, and should be encouraged to form part of longer journeys via public transport. Indeed, it is noteworthy that the Institution of Highways and Transportation (IHT) have prepared several guidance documents that provide advice with respect to the provision of sustainable travel in conjunction with new developments. Within these documents it is suggested that:





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- Most people will walk to a destination that is less than one mile [1.6 km] (Planning for Walking, 2015);
- The bicycle is a potential mode of transport for all journeys under five miles [8km] (Planning for Cycling, 2015); and
- Walking distances to bus stops should not exceed 400 metres, whilst people are prepared to walk twice as far to rail stations (Planning for Walking, 2015).

The site is accessible by the more sustainable modes of travel including foot, cycle and public transport. The shops at Aldwick Road are a very short distance away to the west (less than 50 metres) of the site. Bognor Regis town centre to the east also provides a railway station, which provides regular rail services to the south coast, London and Gatwick airport. Bognor High Street is located approximately 800m from the application site, with the railway station situated circa 1.4km from the site (approximately 15 minute walk).

Existing footways along Aldwick Road link the site to nearby bus stops at Aldwick Road situated to the west (the east bound stop is 75 metres from the site, whilst the west bound stop is 160 metres away), whilst there are further stops at Rock Gardens, circa 270 metres to the east. The following bus services are available from these stops:

Route 61 (Stagecoach)	West Meads, Aldwick » North Bersted retail parks
Route 62 (Stagecoach)	As above, alternative route
Route 600 (Stagecoach)	Chichester » Elmer

As mentioned previously, there are suitable width footways along both sides of Aldwick Road. It should also be noted that the majority of the roads within close proximity to the site benefit from footways due to the site being located within a largely built up area comprising residential dwellings and commercial buildings.





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The footways along Aldwick Road also provide safe and convenient access to the nearby bus stops detailed above.

With regard to cycling, the local highway in close proximity to the site is flat in nature and as such is considered to be suitable for cyclists.

In terms of proximity to other services and facilities, the site is situated as follows:

Education

St Mary's Catholic Primary School - 1 km

Nyewood CofE Infant & Junior School - 1.1 km

The Regis School (secondary) - 1.6 km

Felpham Community College - 2.25 km

Medical

Bognor Medical Centre - 500 metres

Maywood Health Care Centre - 1 km

Bognor War Memorial Hospital - 1.4 km

West Meads Surgery - 1.6 km

Access Arrangements

Existing pedestrian access to the site is to be maintained as existing.

Servicing Arrangements

Servicing linked with the site currently takes place from the hardstanding area to the front of the premises. This existing service arrangement is proposed to be retained for the new residential units that will be formed by the change of use.

Traffic Generation

It is clear that the proposed change of use from office floor space to smaller (studio) residential units will not result in a net increase in trip generation linked to the site.





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On this basis it is not considered that the proposal will prejudice road safety or the free-flow of traffic or operation of the neighbouring highway.

b) contamination risks on the site

The site does not comprise contaminated land as described in Part 2A of the Environmental Protection Act 1990(b).

The existing building is well established and has been in use for a significant period as offices. The proposal is not considered to be at risk from any significant contamination, and we are confident that there would be no contamination issues arising from the proposed change of use.

c) flooding risks on the site

The proposed development lies outside of any area that is subject to flood risk. The Environment Agency flood map (see Fig 4 above) confirms that the site in question lies outside of any area designated as Flood Zones 2 and 3.

d) impacts of noise from commercial premises on the intended occupiers of the development

The building would be wholly used for residential purposes. Aldwick Road and surrounding streets comprise a mix of uses, including; residential flats and individual houses, a car park (opposite), Bognor Regis sailing club (to the south), and commercial premises generally falling with 'A' use classes to the west. These are not uses that would be expected to generate significant noise which would be incompatible with residential uses in the area.

Whilst the commercial premises to the west may be subject to deliveries from delivery vehicles, this is a fairly common situation in partly residential streets, there are other residences on the street and noise impacts would not be so severe as to warrant a refusal.





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e) the provision of adequate natural light in all habitable rooms of the dwellinghouses

An assessment of the submitted drawings will confirm that all habitable rooms are to be provided with adequate natural light from existing window/openings that serve the building.

The provisions of paragraph W (prior approval) apply in relation to this type of application also.

All noted, and addressed above.

Development under Class O is permitted subject to the condition that it must be completed within a period of 3 years starting with the prior approval date.

Noted.



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7. OTHER RELEVANT MATTERS

External Alterations

- 7.1 It is understood that Class O of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) is clear that it only allows for a change of use and no external alterations.
- 7.2 Therefore, if any changes to the existing building or site is required by the Applicant, then it is understood that this would need to be dealt with via a separate planning application submission.



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8. SUMMARY

- 8.1 This application to change the use of an existing B1 office space to form residential units is in complete accordance with the requirements set out under Part 3, Class O of the Town and Country Planning (General Permitted Development) Order 2015 (As amended), and we respectfully request that Prior Approval consent is now granted.
- 8.2 This application for prior approval is made in accordance with the provisions of paragraph W. It is demonstrated above that there are no transport and highways impacts arising from the proposed development; there are no contamination risks at or adjacent to the site; residential amenities will not be harmed, specifically via noise and the provision of light to internal habitable rooms; and there is no flood risk in this area.
- 8.3 Consequently, our opinion is that prior approval for this change of use should now be approved.

September 2020