

The Gables Hotel, 28 Crescent Road, Bognor Regis, PO21 1QG



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cooper

Planning Statement

Introduction

Introduction

This Planning Statement accompanies a retrospective application for the change of use from Hotel (C1 Hotels) to large HMO (Sui Generis) at The Gables Hotel, 28 Crescent Road, Bognor Regis, PO21 1QG.

This submission will detail the proposal and address relevant planning policy issues as identified in National and Local Planning Policy.

This report has been prepared in accordance with the Royal Town Planning Institute Code of Conduct.



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Chartered Town Planner

ARUN DISTRICT COUNCIL BR/268/21/PL

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Planning Statement

Site and Surroundings

Site and Surroundings

The application relates to an existing building on the northern side of Crescent Road, Bognor Regis.

Crescent Road is primarily a residential road.

The property subject to this application comprises a two and a half storey, former hotel - which was once a residential dwelling.

The site falls within a sustainable location, in close proximity to Bognor Regis Town Centre, and Train Station. Additionally, bus stops are closely positioned to the site, allowing for a regular service to Bognor Regis, Chichester, Goodwood, Littlehampton and beyond.



Site and Surroundings



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Relevant Planning History

App Ref: BR/273/18/PL

Change of use from Hotel (C1 Hotels) to 4 No. Flats (C3 Dwelling House) including enlarged dormer & additional door on SE elevation.

Approved - 10th April 2019

The Planning Officer's Report stated:

"Regard should be had to policy SD SP1 of the ALP which states: "When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF)." The site is in a sustainable location within walking and cycling distance of a range of shops, facilities and services including bus stops, a large food store, schools, medical services and a railway station. The proposed flats could contribute to the economic and social needs of the Bognor Regis area.

ALP Policy TOU DM1 states existing visitor accommodation will not be granted permission for a change of use unless it is demonstrated the use is no longer required and the site is unlikely to be reused or redeveloped for visitor purposes. The policy requires that (a) alternative visitor uses have been fully explored; (b) an appraisal is supplied to indicate that the use is no longer viable; (c) that there is evidence that the site has not been made deliberately unviable; and (d) there is evidence of the suitability of the site to accommodate the alternative use.

In response to the concerns raised at the pre-application stage, the applicants have provided a "Marketing and Viability Statement". This sets out that:

- 28 Crescent Road was marketed for sale early in 2016 as it was vacant and no longer viable;
- The owner/occupier could not generate enough income from the guest house to sustain it, at the time of marketing there were no employees as they could not be sustained on the occupation rates;
- When it was marketed, the selling agent commented that property would be suitable for conversion or full re-development

for residential use;

- According to the selling agent, there had not been any further hotels or guest houses on the market in the area since July 2016 and the majority of the smaller ones in the area have been converted;
- The hotel was purchased in July 2016 and has been marketed as such ever since;
- There have been no bookings at the hotel since the purchase;
- The owners have been using the guest house privately for the previous year to house employees who travel in from abroad on a short term basis; and
- The Gables Hotel has been unviable for over two years and is not a loss of valuable tourism.

The Councils Economic Development officers have appraised the application and have stated that the property has not been used for tourism accommodation for some 10 years or more and is not in a particularly prominent tourist location. They raise no objections to the change of use.

The proposed conversion of this property is considered to represent an efficient use of urban land and does so without compromising the character/appearance of the existing building, the existing tourism offer of Bognor Regis, highway safety or the amenities of existing nearby residential occupiers. The proposal is considered to be sustainable development and also complies with all development plan policies. The recommendation to approve is therefore made subject to the following conditions and the signed S.106 legal agreement covering a financial contribution in respect of Pagham Harbour."

Planning Policy

Section 38(6) of the Planning Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Section 38(3) states that the Development Plan includes the Regional Spatial Strategy and other Development Plan Documents.

National Planning Policy Framework (NPPF)

Paragraph 7 states the purpose of the planning system is to contribute to the achievement of sustainable development. This is continued in paragraph 8 which states that achieving sustainable development means that the planning system has three overarching objectives:-

Economic – to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time.

Social – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being;

Environmental – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land.

Paragraph 38 states that Local Planning Authorities should approach decisions on proposed development in a positive and creative way. This was continued in paragraph 39 which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better co-ordination between public and private resources and improved outcomes for the community.

Paragraph 69 states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and are often built up relatively quickly.

Paragraph 86 states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

- define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters
- recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

Paragraph 105 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

Paragraph 119 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 120 states that planning policies and decisions should:-

- encourage multiple benefits from both urban and rural land; give substantial weight to the value of using suitable Brownfield land within settlements for homes and other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- promote and support the development of under-utilised land and buildings, especially if this would help to meet the need for housing where land supply is constrained and available sites could be used more effectively;
- support opportunities to use the air space above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including, comply with any local design policies as standards), and can maintain safe access and egress for occupiers.

Paragraph 124 states that planning policies and decisions should support development that makes sufficient use of land, taking into account:-

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services; desirability of maintaining an areas prevailing character and setting;
- the importance of securing well designed, attractive and healthy places.

Paragraph 126 states that good design is a key aspect of sustainable development, creates better places in which to live and work and help make development acceptable to communities.

Local Plan Policy

Arun Local Plan 2011-2031

Policy D-DM1 relates to aspects of form and design quality and states that when considering any application for development the Council will have regard to the following aspects:

Character

Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.

Appearance

Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.

Impact

Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.

Innovation

Raise standards of design by embracing appropriate innovative design, new technologies and construction techniques, where a development proposal has the potential to do so.

Adaptability

Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.

Crime prevention

Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating buildings and play areas along public routes and spaces, and making a clear division between private and public land.

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Planning Policy

Trees & Woodland

All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.

Solar gain

Within the constraints of the site and local context development proposals should, maximise sunlight and passive solar energy. Ideally development should be positioned (within a 15-20 degree margin) broadly south, with streets having an east-west pattern.

Public Realm

Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.

Layout - movement

Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open spaces, facilities and public transport. Development schemes should carefully consider walking and cycling as an integral part of the overall design concept.

Layout - legibility

Deliver or contribute to the ease of navigation within a new or existing development scheme through use of focal points (landmarks, gateways, vistas, corner buildings, active edges, existing topography), and/or a variety of detail within the public realm (sculpture, planting, street furniture, building materials, building detail, signage).

Public art

Public Art should be incorporated into schemes where there is capacity to do so. Public art can encompass a wide variety of elements to include art as part of the design of buildings and developments, landscape and planting, street furniture, signage and lighting in the public realm which is accessible to all. This can also result in physical, permanent artworks and sculptures.

Density

The density of new housing will make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. Proposals should take into account the density of the site and its surroundings. The density of large sites should be varied to guard against uniformity.

Scale

The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement.

Aspects of form and design quality

Development should also comply with the ADC Design Guide.

Policy D-DM2 relates to internal space standards and states that the planning authority will require internal spaces to be an appropriate size (having regard to exceptions that may apply) to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance.

Policy D-DM4 relates to extensions and alterations to exist buildings and states that when considering applications for extensions and alterations to existing buildings, the Council will require that:

- the extension or alteration sympathetically relates to and is visually integrated with, the existing building in siting, massing, design, form, scale and materials;
- the extension or alteration is visually subservient to the main building and provide a high standard of amenity;
- the extension or alteration does not have an adverse overshadowing, overlooking or overbearing effect on neighbouring properties;
- in streets characterised by relatively small gaps at first floor level between buildings, any extension or alteration at first floor level does not come to within a minimum of one metre of the side boundary and;
- the extension or alteration does not compromise the established spatial character and pattern of the place but is instead a positive addition.

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Planning Policy

Policy D-SP1 relates to design and states that all development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development.

Policy H-SP4 relates to Houses in Multiple Occupation and states that where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where the proposals contribute to the creation of sustainable, inclusive and mixed communities and meet the following criteria:

- Do not adversely affect the character of the area including eroding the balance between different types of housing, including family housing;
- Do not contribute to the generation of excessive parking demands or traffic in an area;
- Provide adequate areas of open space.

Policy SD-SP1 relates to sustainable development and states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland).

Policy SD-SP2 relates to the built-up area boundary and states that development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.

Policy T-SP1 relates to transport and states that to ensure that growth in the District strengthens Arun's economic base, reduces congestion, works to tackle climate change and promotes healthy lifestyles; the Council will ensure that development: provides safe access on to the highway network; contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network.

Policy RET-SP1 relates to retail and states that the hierarchy of centres in Arun will be maintained by supporting and promoting measures which reinforce their role in meeting community needs and providing a focus for a range of activities including retail, leisure, commercial, office, tourism, cultural, community and residential development.

Bognor Regis and Littlehampton will be the main focus for major retail, leisure, commercial, office, tourism, cultural, community and residential development. The Council will positively welcome developments and initiatives aimed at the sustainable economic growth and social wellbeing of town centres. Such developments will diversify customer choice, aid economies resilience, improve quality both in design and the range of facilities and enhance competitiveness.

Policy QE-DM1 relates to noise pollution and states that Residential development likely to experience noise from road, rail or air must:

- Be supported by a noise exposure category (NEC) assessment and designed to ensure that residents will not be adversely affected by noise.
- Consider both the likely level of exposure at the time of application and any increase that might be reasonably expected in the foreseeable future.

Policy QE-SP1 relates to quality of the environment and states that the Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

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Material Considerations

Policy TOU DM1 relates to tourism related development and states that excepting Permitted Development Rights or Local / Neighbourhood Development Orders, existing visitor attractions, facilities and accommodation (except camping and caravan sites), will not be granted planning permission for a change of use that leads to the loss of a visitor offer unless it is demonstrated that the use is no longer required and the site is unlikely to be reused or redeveloped for visitor purposes. To demonstrate these requirements, the Council will require:

- that alternative visitor uses have been fully explored;
- an appraisal indicating that the use is no longer viable;
- evidence that the site has not been made deliberately unviable; and
- evidence of the suitability of the site to accommodate the alternative use.



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Principle

Policy H SP4 (ALP) states where applications for houses in multiple occupation are not covered by permitted development rights, they will be favourably considered where proposals contribute to the creation of sustainable, inclusive and mixed communities and meeting the detailed criteria.

In applying this criteria to development proposals, para 12.5.1 of the Local Plan makes clear that 'it is important to ensure that mixed and balanced communities are developed so that situations where existing communities become unbalanced by the narrowing of household types towards domination by a particular type, such as shared housing, are avoided.'

Paragraph 12.5.5 of the Local Plan also makes clear that 'larger households tend to generate more refuse, regardless of whether the property is occupied by a single family or in multiple occupation.'

- A. Do not adversely affect the character of the area including eroding the balance between different types of housing, including family housing;
- B. Do not contribute to the generation of excessive parking demands or traffic in an area;
- C. Provide adequate areas of open space.

The supporting text for policy H SP4 states that it is important to ensure that mixed and balanced communities are developed so that situations where existing communities become unbalanced by the narrowing of household types towards domination by a particular type (such as HMOs) are avoided. The aim of the policy is therefore to avoid an over-concentration of HMOs and to provide a range of mixed housing types to support a balanced neighbourhood.

The Arun District Council register of HMO licences online shows that only the application site benefits from a licence (albeit that it is accepted that this retrospective application reflects the fact that the use is without the benefit of planning permission).

Licence Number: 112956
Licence Type: HMO Mandatory
Status: Granted
Issue Date: 13-02-2020
Start Date: 29-11-2019
Number Of Households: 9

Description Of Licensed HMO: Three-storey house with shared kitchen, dining room and bathrooms, with some en-suite bathrooms.

Based on this, the proposed change of use would therefore retain a mixed and balanced neighbourhood in line with local planning policy.

Additionally, it is important to recognise the good standard of accommodation which will be well serviced, managed and maintained.

The proposed development will provide much needed housing within a central and highly sustainable location, making use of a building which has the opportunity to provide a mix of uses.

The other elements referenced above (transport and open space) are addressed later in this Statement.

On the basis of the above and information later in this Statement, the development is considered to comply with Policy H SP4 of the Local Plan.

Loss of Tourism Accommodation

ALP Policy TOU DM1 states existing visitor accommodation will not be granted permission for a change of use unless it is demonstrated the use is no longer required and the site is unlikely to be reused or redeveloped for visitor purposes. The policy requires that (a) alternative visitor uses have been fully explored; (b) an appraisal is supplied to indicate that the use is no longer viable; (c) that there is evidence that the site has not been made deliberately unviable; and (d) there is evidence of the suitability of the site to accommodate the alternative use.

The NPPF does not contain specific guidance in respect of safeguarding tourism uses. It is noted that para 86(f) states that planning policies should recognise that residential development often plays an important role in ensuring the vitality of town centres and that therefore policies should encourage residential development on appropriate sites.

The previous application, approved in April 2019, was accompanied by a Marketing and Viability Statement. This Statement confirmed the following:

- 28 Crescent Road was marketed for sale early in 2016 as it was vacant and no longer viable;
- The owner/occupier could not generate enough income from the guest house to sustain it, at the time of marketing there were no employees as they could not be sustained on the occupation rates;
- When it was marketed, the selling agent commented that property would be suitable for conversion or full re-development for residential use;
- According to the selling agent, there had not been any further hotels or guest houses on the market in the area since July 2016 and the majority of the smaller ones in the area have been converted;
- The hotel was purchased in July 2016 and has been marketed as such ever since;
- There have been no bookings at the hotel since the purchase;
- The owners have been using the guest house privately for the previous year to house employees who travel in from abroad on a

short term basis; and

- The Gables Hotel has been unviable for over two years and is not a loss of valuable tourism.

In addition, in determining the previous application, the Council's Economic Development officers have appraised the application and have stated that the property has not been used for tourism accommodation for some 10 years or more and is not in a particularly prominent tourist location. As a result, they raised no objections to the change of use.

Instead of implementing the planning permission to convert the building to four flats (April 2019), the owner converted the building into a HMO on 29th November 2019 - as identified within the HMO licence.

To support the application, a local agent was contacted to provide an update on the tourism market within the area:

"Hi Alex,

Following on from my email in April 2018 regarding the demand for guest house space, I can confirm that there has been a continuing decline for the requirement of hotel /guest houses in Bognor Regis.

Since the expansion of the Butlins site the majority of visitors to the area stay within the resort itself, so there is less demand now than ever for accommodation outside of Butlins.

I have recently sold a former Hotel on Bognor seafront on the corner of West Street, which has been vacant for several years. The new owner is now looking to convert this to residential use flats for the sea facing part of the building and HMO use at the rear, as there is a requirement for low end housing in this area as people move out of more expensive areas such as Chichester."

A copy of the email can be provided at request.

It is therefore important to note that the previous application, approved in April 2019, confirmed that there was no demand in the building for 3 years. Since that time, it has been used as a HMO.



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Design

Policy D DM1 of the Arun Local Plan requires the Council seek to make the best possible use of land by reflecting or improving upon the character of the site and the surrounding area. It requires the Council to consider scale, massing, aspect, siting, layout, density, building materials, landscaping, and design features. It is necessary that development demonstrates a high standard of architectural principles, use of building materials and hard and soft landscaping to reflect the local area. In terms of density, D DM1 requires that housing makes efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. The policy requires the scale of development keep within the general confines of the overall character of a locality.

Policy D DM4 requires extensions/alterations: sympathetically relate to and are visually integrated with the existing building in siting, massing, design, form, scale & materials; are visually subservient to the main building & provide a high standard of amenity; do not create a terracing effect where no terrace exists; and do not compromise the established spatial character & pattern of the place.

The proposals seeks to make minimal changes to the exterior of the building and will preserve the existing appearance.

The proposal therefore complies with ALP policies D DM1 and D DM4.

Landscaping

Given the retrospective nature of the application, no landscaping is proposed.

Sustainable Transport

In respect of parking, ALP policy T SP1 states that: "The Council will support transport and development which: incorporates appropriate levels of parking in line with West Sussex County Council guidance on parking provision and the forthcoming Arun Design Guide taking into consideration the impact of development upon on-street parking"

Para 110 of the NPPF states:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: (b) safe and suitable access to the site can be achieved for all users".

Regard should be had to para 111 which states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

The scheme includes no off-street parking. The site is in an accessible town centre location within a few minutes walk from Bognor Regis railway station, bus stops and food stores and other shops and services. The Railway station provides regular train services to Barnham, Chichester, Littlehampton, Arundel and beyond.

The development is not considered to result in excessive parking demands.

The proposal accords with H SP4 & T SP1 of the ALP and with the guidance on highway safety in the NPPF.

Planning Statement

Material Considerations

Impact on Amenity

Policy D DM1 requires the Council have regard to certain aspects when considering development including having minimal impact to users and occupiers of nearby property and land. Policy D DM4 requires that extensions/alterations: do not have an adverse overshadowing, overlooking or overbearing effect on neighbouring properties.

Policy QE SP1 states: "The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity".

There are no new windows and although there are changes to the building layout, these are not considered to result in new amenity impacts to neighbouring or nearby properties.

The proposal complies with policies D DM1 and QE SP1.



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Standard of Accommodation for Future Occupiers

Licensing requirements for HMOs require bedrooms to have a floorspace of at least 6.51sqm.

Every bedroom within the proposed HMO would meet/exceed the current Nationally Described Space Standards as follows:

- Unit 1 - 20.13 sqm
- Unit 2 - 14.2 sqm
- Unit 3 - 12.3 sqm
- Unit 4 - 12.1 sqm
- Unit 5 - 12.1 sqm
- Unit 6 - 16.1 sqm
- Unit 7 - 17.7 sqm
- Unit 8 - 10.8 sqm
- Unit 9 - 24.2 sqm

A communal WC is located on the ground floor, together with a communal lounge and kitchen.

At the first floor, there is a communal bathroom.

As a licence has already been approved for the building, it is considered that these sizes are suitable and acceptable.

The third criteria of Policy H SP4 requires HMOs to provide adequate areas of open space.

There is no guidance on what is considered “adequate” and therefore this represents a judgement based on facts on the ground and any site constraints. The site is located within the Town Centre of Bognor Regis and therefore any scheme is constrained in providing large quantities of open space.

However, the development features a private amenity space at the rear of the building. The area would provide a secluded, quiet and usable space for the residents. As mentioned, given the location of the site, it is considered that the provision of open space needs to be suitable. It is important to note that the site is a 1-minute walk to

Hothampton to the south, which provides further open space options.

The development would therefore provide adequate amenity space compliant with criteria (c) of Policy H SP4 of the Local Plan.

Bin Storage

Policy WM DM1 (ALP) requires residential development to ensure that kerbside collection is possible for municipal waste vehicles and, where possible, communal recycling bins and safe storage areas to be available.

The site benefits from an existing bin store.

The location of the bin store is adjacent to the Crescent Road and would rely upon traditional drive-by collections. The dragging distance is minimal and would be acceptable on bin collection days.

Taking into account the above, the development accords with Policy WM DM1 of the Arun Local Plan.

Sustainability

Paragraph 8 of the NPPF sets out the three key aspects of Sustainable Development:

- Economic
- Social
- Environmental

Considering these aspects against the proposals, the development would achieve the following:

Economic Benefits

- The creation of construction jobs.
- The creation of other jobs in supply chain and wider construction related activities.
- Additional household expenditure and tax income benefitting the local area.

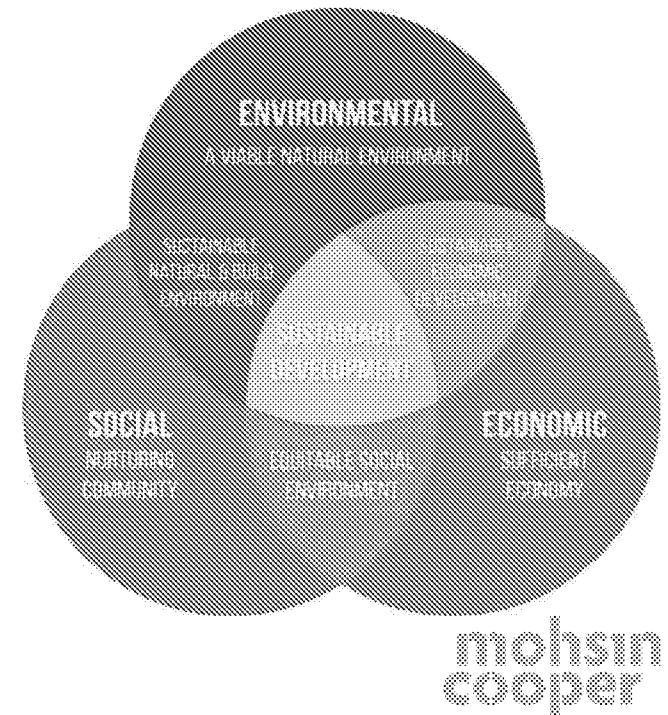
Social Benefits

- The delivery of needed HMO units
- Development in a sustainable location in a settlement with a suitable range of facilities to support future residents.

Environmental Benefits

- Protecting and enhancing the natural built, and historic environment by developing on a site with no specific environmental or heritage designations.
- Sustainable form of construction reducing the pressures on energy.
- A sustainable location of the proposal means that future residents have the option of using sustainable forms of transport for everyday trip to use services/facilities.

It is considered therefore that the proposed development would generate significant economic, social and environmental benefits and there are no adverse impacts that would significantly and demonstrably outweigh said benefits.



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Planning Statement

Summary

Summary

This Planning Statement accompanies a retrospective application for the change of use from Hotel (C1 Hotels) to large HMO (Sui Generis) at The Gables Hotel, 28 Crescent Road, Bognor Regis, PO21 1QG.

The site was once occupied by a hotel, which has been vacant since 2016. The loss of the hotel was accepted by approval in April 2019 and updated marketing information confirms that the position remains the same - or even worse given recent Brexit and Covid-19 impacts.

Policy H SP4 requires that HMO developments meet the following criteria;

- a. do not adversely affect the character of the area including eroding the balance between different types of housing.
- b. Do not contribute to the generation of excessive parking demands or traffic in an area.
- c. Provide adequate areas of open space.

The proposed change of use would retain a mixed and balanced neighbourhood in line with local planning policy.

Additionally, it is important to recognise the good standard of accommodation which will be well serviced, managed and maintained.

The proposed development will provide much needed housing within a central and highly sustainable location, making use of a building which has the opportunity to provide a mix of uses.

The property already benefits from a HMO licence, approved in November 2019. This application therefore aims to align the planning and licence position.

It follows that planning permission should be approved.