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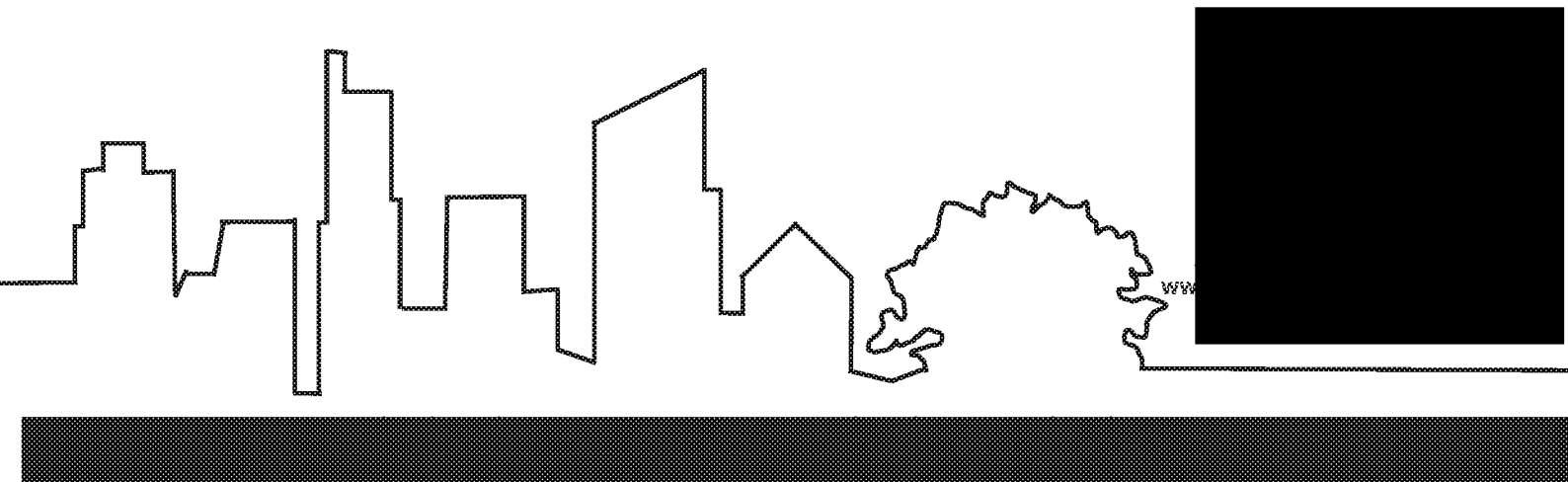
PLANNING STATEMENT

Royal Hotel,
The Esplanade,
Bognor Regis
P021 1SZ

Refurbishment, external alterations, extensions and
reconfiguration of previously permitted
conversion to retain ground floor/A3
restaurant and provide a total of 27 flats

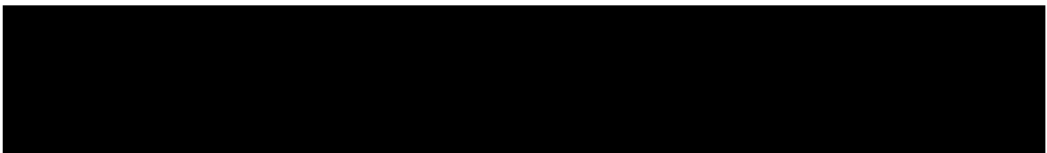
December 2018

Planning Portal Ref PP- 07487745



INDEX

- 1.0 INTRODUCTION**
- 2.0 SITE & SURROUNDINGS**
- 3.0 PLANNING HISTORY**
- 4.0 PLANNING POLICY**
- 5.0 THE PROPOSAL**
- 6.0 CONSULTATION**
- 7.0 ASSESSEMNT**
- 8.0 CONCLUSIONS**



1.0 INTRODUCTION

- 1.1 This application is submitted on behalf of Metamorph Management Ltd to revive, refurbish and bring this important seafront building back into active use with a revised residential conversion scheme that provides a ground floor restaurant and increases the number of flats compared to previous approvals.
- 1.2 As set out in the accompanying Heritage Statement the application building is a non-designated heritage asset located within a Conservation Area.
- 1.3 This application package comprises:
- Application forms, Certificate B
 - Design & Access Statement by Randell Design Group
 - Heritage Statement by John Pike
 - Transport Statement by Basham Associates
 - Sunlight & Daylight report by Malcolm Hollis
 - Plans: 2S6 - Royal Hotel 2nd floor, 3rd floor, Basement & Ground Floor, Elevations Sheet 1 & 2, Topo, 169 1.000 Rev 1, 169 3.000 Rev 1, 169 3.010 Rev 1, 169 3.100 Rev 1, 169 3.101-106 Rev 1, 169 3.200 – 202 Rev 1
Job No Drawing Issue Sheet
S844 First Floor Plan



2. SITE & SURROUNDINGS

Site

- 2.1 The site comprises a 2,3 and 4 storey plus lower ground level vacant hotel with an ancillary nightclub located on the seafront close to the pier on the western edge of the town centre.
- 2.2 The history and evolution of the building are described in detail in the accompany Heritage Statement.
- 2.3 The original, extended and altered, hotel has a distinct 2 storey & lower ground level wing that comprises the former Jack Rabbit Slims nightclub
- 2.4 There is a very obvious contrast in architectural style between the hotel front and Jack Rabbit Slims as illustrated in the following photographs. There is also a very marked contrast in the quality of design and architectural detailing between the front and rear of the hotel, as shown in the photographs.
- 2.5 The hotel frontage has ornate decoration with bays, balconies, corbel and dentil eave details whereas the rear is very plain.



Application site viewed from the Esplanade seafront





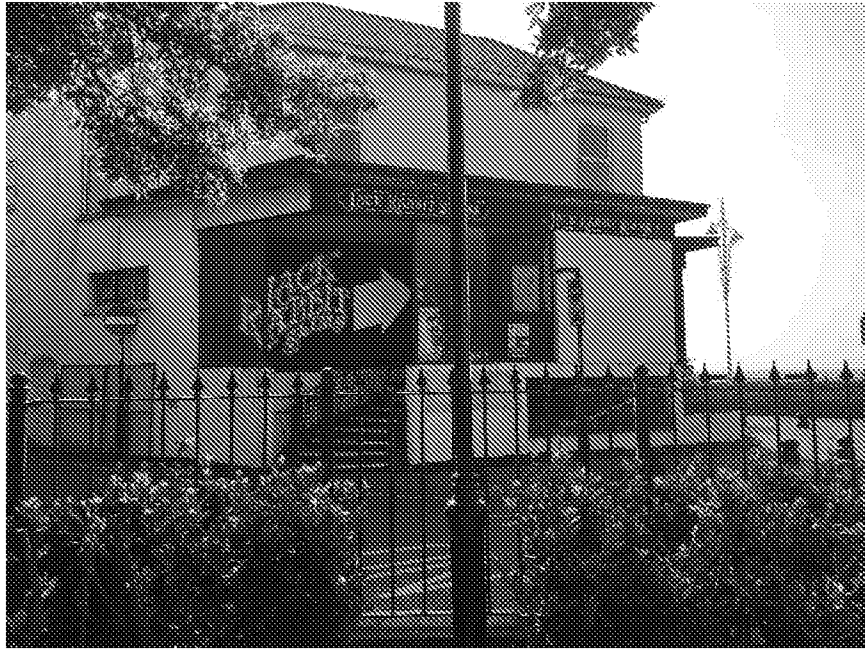
Hotel front elevation

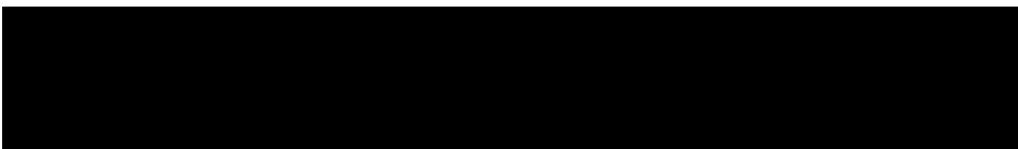
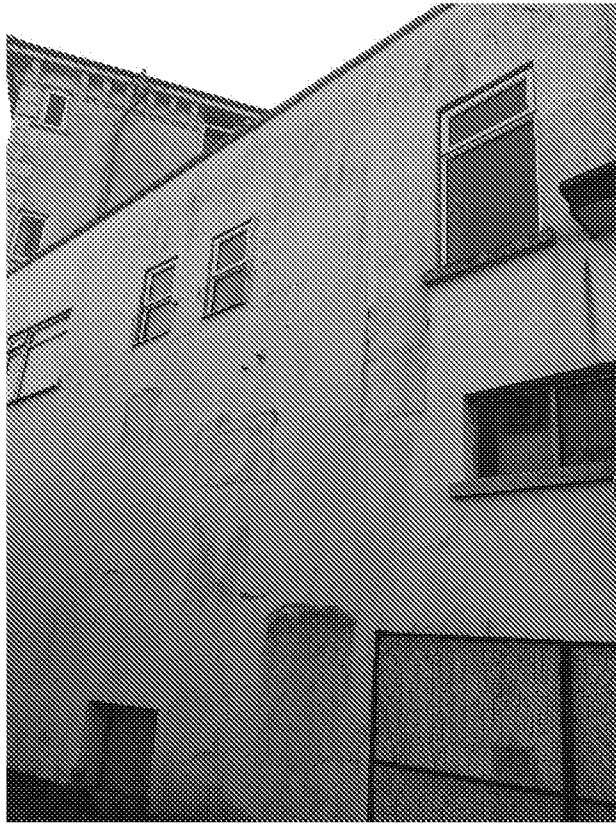




Jack Rabbit Slims front elevation









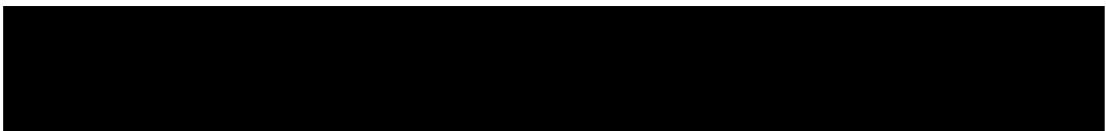


Side (West) and rear (North) elevations of hotel and Jack Rabbit Slims

Surroundings

- 2.6 The site fronts onto The Esplanade beyond which there is a seafront promenade and then a sandy beach. It is located close to the pier a short distance to the west of the crazy golf and bowls club in Waterloo Square which adjoins the western end of the High Street shopping area.
- 2.7 Immediately to the east of the site, toward Waterloo Square, there is a 3 storey building in a modern style with a café at ground level. Around the corner on the west side of Waterloo Square there is an attractive mix of 2 and 3 storey houses that date from 1815 onwards.
- 2.8 West of the site there is the open garden of the Steyne also surrounded by an attractive mix of 2 and 3 storey housing that dates from the 1820's.

There is a pedestrianised area that isolates the Steyne from The Esplanade for vehicular traffic, this includes a service bay for the hotel.





Service bay within pedestrianised area to west of Jack Rabbit Slims

- 2.9 Manor Place runs immediately to the north side, a narrow one-way street that links Waterloo Square and Market Street to the Steyne. Across Manor Place there is 2 storey housing that has elevations directly on to the rear edge of the footway.
- 2.10 The surroundings have a refined gentility derived from the period housing and generous open spaces. The principal jarring contrast to this character is the unsympathetic modern extension, Jack Rabbit Slims, that forms part of the application site.



Aerial photograph to show Waterloo Square, The Steyne and the pier

3.0 PLANNING HISTORY

- 3.1 The planning history includes various applications for alterations and advertisements, only those of principal interest and referred to below.
- 3.2 Upgrading of the hotel, provision of a leisure complex in the basement and conversion of the first floor into “10 studio/1 bedroom apartments” was permitted in April 1988 (ref BR/121/88)
- 3.3 A new front entrance canopy and steps together with new parking and drop off area was permitted in January 1992. The parking area was re-permitted in 1998 (refs BR/324/91 and BR/50/97). This appears to have been provided but is now prevented from vehicle use by a line of bollards.
- 3.4 Planning permission was granted (Council reference BR/155/15/PL for “change of use of redundant hotel and function room/licensed bar (C1 hotel) to 10 no. flats (C3 dwelling houses)” in November 2015. The officer report advised that there were already 10 flats within the building as a result of a 1988 planning permission. Therefore the 2015 permission resulted in a total of 20 flats and the complete loss of the hotel and Jack Rabbit Slims function. The permitted scheme provided no parking and included a £14,040 contribution toward provision of affordable housing and a £12,750 “Access Management Contribution” secured by s.106 Agreement. The publicly available documents on the Council website do not clarify how the £14,040 sum was calculated.
- 3.5 Loss of the hotel was regretted but the then applicants provided evidence to demonstrate that the hotel was no longer viable. Even at that time it is understood to have been recognised that substantial investment was required in the fabric of the building (no copy of the submitted viability report on the Council website).
- 3.6 The officer report notes that all of the proposed new flats exceeded the (then) new government advice for internal space standards, some very subsequently exceeded the standards. Indeed, the current applicant has identified the size of some of the units as a reason that the approved scheme is not a viable proposition, perhaps helping to explain why the hotel has remained undeveloped and in a deteriorating state of repair and that a second application was made in 2017.
- 3.7 The officer report also noted that none of the 2015 flats had access to any external space but that Local Plan policy DDM3 allows exceptions to such provision to be made in respect of town centre locations.

- 3.8 Planning permission was then granted in 2017 for an alternative scheme that provided a total of 18 flats throughout the converted hotel. Seemingly, as this amounted to a reduction on the total number of flats permitted in 2015, there was no affordable housing contribution required in the s.106 Agreement, only an Access Management contribution of £6,968 to mitigate possible harm to Pagham Harbour.
- 3.9 The 2017 officer report continued to regret loss of the hotel but acknowledged that the principle of its loss had already been agreed.
- 3.10 With fewer flats than the 2015 scheme there was no objection on highways or parking grounds.
- 3.11 Of the 18 flats in the 2017 scheme, 5 failed to meet the emerging Local Plan standards. The officer report notes that the scheme has 72% compliance with DDM2 internal space standards. It was, again, accepted that the flats would have no external amenity space.
- 3.12 Despite acceptance of the loss of the hotel use and the grant of permission for 2 different conversion schemes to flats the hotel has remained vacant and not attracted any commercial interest. The current applicant attributes this to the size of the flats making the scheme unviable in the local housing market.



4.0 PLANNING POLICY

NPPF

- 4.1 The July 2018 NPPF continues to urge Councils to deal with individual applications in “a positive and creative way” working pro-actively with applicants to secure beneficial developments seeking to “approve applications for sustainable development where possible” (para 38).
- 4.2 Achieving sustainable development gives the planning system 3 main objectives: economic, social and environmental (para 8). At the heart of the NPPF there is presumption in favour of sustainable development (paras 10 and 11). Schemes that accord with the development plan should be approved without delay (para 11).
- 4.3 The Government has the objective of significantly “boosting the supply of homes” and that land with permission should be developed without delay (para 59). Small and medium sized sites are especially welcomed as these can be built-out relatively quickly (para 68).
- 4.4 The importance of affordable housing provision is emphasised but paragraph 63 sets out that the re-use of brownfield land and vacant buildings is to be supported by the application of vacant building credit to reduce potential contributions.
- 4.5 In considering proposals that impact heritage assets para 196 sets out that where there is less than substantial harm any harm should be weighed against the public benefits of the proposal (para 196). In considering proposals that impact on non-designated assets any impact on significance should be taken into account in a balanced judgement (para 197).
- 4.6 NPPF is strongly supportive of high quality design in new proposals (para 124) with “great weight” to be given to proposals that “help raise the standard of design more generally in an area”.

Arun Local Plan 2011-2031 (July 18)

- 4.7 Policy SD SP1 repeats the guidance set out in NPPF regarding pro-active working with a positive approach to secure the sustainable development objectives.
- 4.8 Table 12.1 sets out that the housing supply relies upon 847 “windfall” sites coming forward.



- 4.9 The Council seeks a mix of dwelling types and sizes in residential developments through policy HDM1 with affordable provisions for schemes of more than 11 units, any tenure mix to be agreed on a case by case basis. AH SP2 goes into greater detail on affordable housing provision seeking 30% provision in schemes of 11 units or more together with advice on tenure split.
- 4.10 Good design of all schemes is sought in policy DSP1 with greater detail in D DM1 which also seeks the best use of available land and, *inter alia*, a density for housing that promotes efficient land use and a scale appropriate to the context.
- 4.11 Policy D DM2 seeks the application of nationally adopted internal space standards albeit accepting (in paragraph 13.3.4) that this may not be possible in all instances, in particular in converting buildings, especially historic buildings. Paragraph 13.3.5 states that a future detailed design guide will set out external space standards replacing draft policy D DM3 which had sought to impose standards albeit recognising that these would not always be achievable.

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Source: Technical housing standards – nationally described space standard March 2015

- 4.12 Policy TOU SP1 encourages sustainable tourism proposals in particular to promote the coast. TOU DMI provides further support provided these are well located, manage visitors transportation and management issues together with good design.



- 4.13 Design guidance is further specified in policy D DM1 for extensions to existing buildings seeking to ensure sympathy with the context, visual subservience, no adverse over shadowing or overlooking and no adverse impact on established spatial character.
- 4.14 Policy ECC SP2 expects all proposals to be energy efficient and incorporate renewable and low carbon systems where possible.
- 4.15 Policy T SP1 seeks “appropriate levels of parking in line with West Sussex Council guidance on parking provision”.
- 4.16 Locally listed buildings are recognised in policy HER DM2 seeking that alterations or extensions relate sensitively respecting their interest whilst preserving any particular features.
- 4.17 The protection for Conservation Areas set out in NPPF is re-iterated and enlarged upon in policy HER DM3 seeking sensitive design and appropriate materials for alterations and additions and ensuring that important views into or out of the Area are not harmed.
- 4.18 The Council has identified a 5km zone around the Pagham Harbour SPA (within which the site is located), policy sets that any development likely to have an impact on the SPA will be required to make a contribution toward the future management of the area.

Neighbourhood Plan

- 4.19 The Bognor Regis 2015 – 2030 Neighbourhood Development Plan August 2015 includes no policies to the site but includes it within the “wider town centre”.
- 4.20 Policy 2 seeks to ensure that new proposals in the wider town centre “secure, restore and boost our seaside identity first” by “responding eloquently and innovatively to the local build environment and setting”.
- 4.21 Policy 7 seeks to support and encourage tourism related proposals.



5.0 THE PROPOSAL

- 5.1 It is proposed to provide a lower ground floor and ground floor restaurant with a gross internal floor area of c.200 sqm. The kitchen will be at lower ground floor level. As the existing kitchen location is not being utilised it will be necessary to provide a new kitchen extract system.
- 5.2 The new kitchen extract system will be designed once the detail of the restaurant and potential occupier are known and can be secured by planning condition. An internal duct has been provided and space is shown for any necessary equipment. A significant benefit of providing a new system is that the unsightly old system with a simple unfiltered flue up the rear elevation can be removed.
- 5.3 Currently, there is no occupier fixed for the restaurant so hours of operation will be uncertain, but it seems likely this will be with opening until 00.00.
- 5.4 A restaurant of this size might be expected to have c.60 covers and employ c. 12-18 staff.
- 5.5 The remainder of the building is proposed to be converted to flats.
- 5.6 The flats provide a variety of sizes: 1 x studio, 12 x 1 bedroom, 13 x 2 bedroom and 1 x 3 bedroom units as follows:

Flat	No of Bedrooms	Floor Area (sqm)
1	1	52
2	1	40
3	1	52
4	1	56
5	2	69
6	1	42
7	2	79
8	1	54
9	1	47



10	1	58
11	2	44
12	1	54
13	1	45
14	1	50
15	1	53
16	1	47
17	1	58
18	1	44
19	2	54
20	1	45
21	1	50
22	1	53
23	2	65
24	2	76
25	2	55
26	2	46
27	2	61

- 5.7 The restaurant and flats have separate refuse and cycle storage areas at lower ground level.
- 5.8 The proposal provides a 2nd and 3rd floor extension above the former Jack Rabbit Slims conversion of the roof space above the main hotel building with new dormer windows inserted and a new mansard in place of the current pitched roof on the eastern section of the building.



- 5.9 The former Jack Rabbit Slims front elevation is reconfigured with removal of the dark glazing and stepped frontage to create a completely refurbished front façade with glazing to the ground floor restaurant leading into the glass fronted balconies and new balconies to the 1st & 2^d floors. The 3rd floor is set back in a mansard roof.
- 5.10 The facades of the main hotel building are completely refurbished and restored removing modern insertions on the front elevation together with the blocking of the lower ground floor windows. New railings will be installed to the restored lower ground floor light wells. The front elevation will be fully restored.
- 5.11 In common with the existing lawful use and predecessor flat conversion schemes the proposal provides no car parking.
- 5.12 There is a service bay available on The Steyne for refuse collection and use by the restaurant..
- 5.13 Details and justification of the design are included in the accompanying Design & Access Statement.

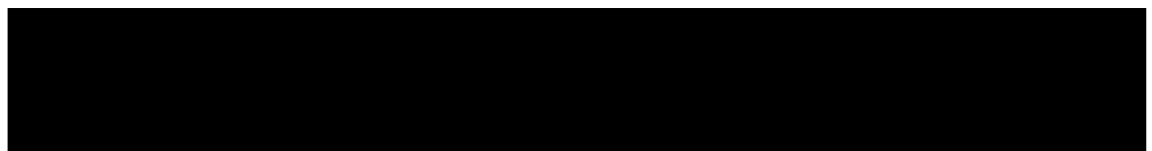


6.0 CONSULTATION

- 6.1 The applicants have undertaken informal Pre App discussions with the Council regarding the extension of the building and received support in principle for the approach taken by the scheme.
- 6.2 The applicants arranged a public exhibition of the scheme at the site on 6/12/18 having delivered 300+ invitation letters to local residents and businesses, the Town Council, Arun Councillors and other local stakeholders.
- 6.3 The exhibition was attended by c.45 people over the 12.30-19.30 period many of whom completed comment forms.



Photo of Exhibition 6/12/18



6.4 The response to comment form questions was as follows 26 were completed.

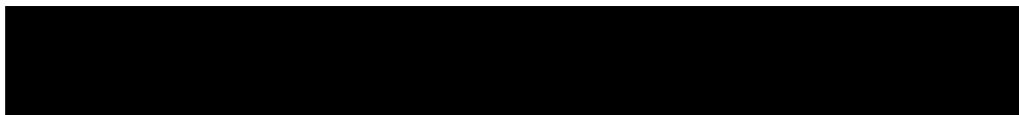
		Yes	No
1	Do you support this scheme that refurbishes the Royal Hotel and brings it back into use as flats & restaurant?	26	0
2	Limited additions are proposed to the non-original part of the hotel to create a comprehensive + sympathetic architectural composition that retains the pre-eminence of the original hotel. Do you support these additions?	25	1
3	We aware of the disappointment when the hotel closed and have included a new restaurant to provide a seafront facility. Do you support inclusion of the restaurant?	25	*

* no answer to Q3 on one form.

6.5 Further comments were as follows:

Comment	Response
Positive	Noted
• Brings building back into use	
• Restores some features and preserves heritage	Noted
• Bin storage welcomed	Noted
• Bike storage welcomed	Noted
• Positive works to the garden welcomed	Noted
• Improves image of the town	Noted
To work on	The existing parking bays or service bay should be used
• Dropping off point for restaurant	
• Disabled parking space	There is no scope for on-site provision, the Council could allocate one of the frontage spaces.
• Would like to see west elevation	Now included in package
• Need environmental maintenance plan	With new residential + commercial occupiers there will be a great incentive to keep the site tidy even without the need for a formal plan.
• Lift access for all floors	The different levels in the building make this very difficult and not viable but a lift is provided that gives access to most flats.

• Construction Management Plan needed	Agreed, this can be secured by planning condition,
Negative • Concerns over resident parking	There is no scope for off road parking without demolishing all or part of the building. New residents will know the position, cycle parking is provided and public transport is available.
• Concerns over security due to sale of alcohol	The hotel and nightclub formerly sold alcohol so there will be substantial reduction as a result of the scheme which only has a restaurant. Opening hours will be controlled by Licensing. The proposal is an improvement on the current position.
• Not like the flat roof or the extensions	The Mansard roofs with a flat top provide an optimal way to provide floorspace whilst avoiding excessive height. Mansard roofs are a common feature on buildings of this age and if well detailed can be a strongly positive feature.



7.0 ASSESSMENT

Principle

- 7.1 The proposal provides new residential flats in a predominantly residential area in a building that has been previously approved for residential conversions.
- 7.2 The proposal not only makes use of an existing building it restores and provides the optimum viable use of a heritage asset that is currently slipping into disrepair.
- 7.3 The proposal fully accords with NPPF principles of providing more housing, making use of under utilised land and buildings, bringing heritage assets into appropriate viable use and improving design.
- 7.4 The proposal makes a modest but valuable contribution toward the achievement of housing targets through “windfall sites” increasing upon the previous maximum total of 20 flats at the site.
- 7.5 The loss of the hotel (and night club) use has already been accepted and there is an extant permission for conversion of the whole building to flats.
- 7.6 Inclusion of a restaurant within the scheme makes a contribution toward meeting policy TOU SP1 by providing a facility for residents, visitors and tourists on The Esplanade in close proximity to other facilities.
- 7.7 The proposal is acceptable as a matter of principle and meets NPPF and Local Plan policy in particular D DM1 that seeks efficient use of sites with development of appropriate scale.

Internal & External Space Standards

- 7.8 Local Plan policy D DM2 sets out standards that will be sought to be achieved, recognising that this will not always be possible.
- 7.9 As set out in section 3 above not all of the flats in the (extant) approved 2017 scheme met internal space standards.
- 7.10 Neither the 2015 nor the 2017 permissions have attracted a developer to refurbish and convert the building, not least as the flat sizes/specifications do not represent a viable proposition. The current scheme has been carefully researched with a range of flats to better fit local market conditions.



7.11 The proposed flats are set out against D DM2 standards below:

Flat	Bedroom	Floor Area (sqm)	D DM2 Standards	Difference to Standard	Compliance
1	1	52	50	2	✓
2	1	40	N/A	N/A	✓
3	1	52	50	2	✓
4	1	56	50	6	✓
5	2	69	61	8	✓
6	1	42	50	-8	x
7	2	79	70	9	✓
8	1	54	50	4	✓
9	1	47	50	-3	x
10	1	58	61	-3	x
11	2	44	50	-6	x
12	1	54	61	-7	x
13	1	45	50	-5	x
14	1	50	61	-11	x
15	1	53	61	-8	x
16	1	47	50	-3	x
17	1	58	61	-3	x
18	1	44	50	-6	x
19	2	54	61	-7	x
20	1	45	50	-5	x
21	1	50	61	-11	x
22	1	53	61	-8	x



23	2	65	61	4	✓
24	2	76	76	0	✓
25	2	55	61	-6	x
26	2	46	50	-4	x
27	2	61	61	1	✓

- 7.12 It can be seen that, as with the 2017 scheme not all flats meet the D DM2 standard. It can be seen that 10 flats comply with the guidance but it must be noted that the deficits against the D DM2 standards in the remaining 17 flats are relatively small, averaging only 6.1sqm.
- 7.13 Preparing a scheme that fully complied with the D DM2 standard would reduce the number of units and endanger viability and repeat the mistakes of the 2015 and 2017 schemes.
- 7.14 In the context of considering the proposal against Local Plan standards it is important to acknowledge that the 10 existing flats at the time of 2015 permission comprise 6 no. "studio" 1 person 1 bedroom flats and 4 no. 2 person 1 bedroom flats none of which meet standards. Indeed, some of the deficiencies against standard are quite extreme, up to 20 sqm, with an average of 10.9 sqm per unit.
- 7.15 If the 2015 scheme were completed it would provide a development where 50% of the 20 units were below standard by an average of 10.9 sqm (the 10 existing flats) as all of the then propose units were above standard. Whereas the current proposal for 27 units is not only more viable/deliverable it has only 63% of the 27 units below standard by an average of 6.1 sqm.
- 7.16 Therefore, the current scheme represents a significant improvement in quality of accommodation over the 2015 permitted scheme. Furthermore, the current scheme is viable, deliverable and able to contribute toward meeting housing need in this area whilst the 2015 scheme has failed to materialise. The 2017 scheme, whilst achieving a greater level of compliance with policy D DM2 is not viable as some of the units are so large that the scheme becomes unmarketable, hence it remains unimplemented with the building slipping into disrepair, furthermore, the average deficit in the 2017 non-compliant flats was 5.2sqm, ie very similar to the average in the current scheme.
- 7.17 It is also acknowledged that the scheme provides no external amenity space but neither do the 2015 or 2017 approved scheme. There is



generous open space very easily available, very nearby including the beach and policy accepts that flexibility is necessary in town centre schemes.

- 7.18 In this context it is also important to remember that it would be inappropriate to seek to add or enlarge the balconies to the front elevation flats in the main building as this would adversely impact on appearance. But, it is proposed to add balconies to the 3 flats above the former Jack Rabbit Slims thereby increasing the number of units with this benefit.

- 7.19 The proposal is to convert (and extend) an existing heritage asset building, in such a context it will not always be possible to achieve modern standards. The scheme meets policies D DM2 bearing in mind the exception set out in paragraph 13.3.4 and provides as much external space as is practicable.

Affordable Housing

- 7.20 Policy AH SP2 sets out that schemes of more than 11 dwellings will be expected to provide affordable housing at 30%, except where this not viable under which circumstance a reduced amount or off-site provision might be agreeable. In this instance the scheme provides a net increase of 17 units over the lawful number of 10.

- 7.21 NPPF fully supports the provision of affordable housing on sites of 10 or more units subject to the application of vacant building credit to encourage the re-use of brownfield land and vacant buildings.

- 7.22 The current gross internal floor area of the building = 2,053 sqm compared to the proposed gross internal area of 2,177 sqm. Vacant building credit can be applied as follows:

$$17 \text{ units} \times 30\% = 8.1 \text{ units}$$

$$2,053 \text{ existing floor areas} / 2,177 \text{ floor area} \times 100\% = 94.3\%$$

$$8.1 \text{ units} \times 94.3\% = 7.64 \text{ affordable housing vacant building allowance}$$

$$8.1 \text{ units} - 7.64 \text{ units} = 0.46, \text{ rounded down to 0 affordable housing contribution to be provided by the scheme.}$$

- 7.23 On this basis the scheme includes no affordable housing provision

- 7.24 It is noted that the 2017 proposal gave rise to no affordable housing contributions and that the 2015 scheme gave rise to a £14,040 contribution.

Housing Mix

- | | |
|------|--|
| 7.25 | Local Plan policy H DM1 seeks to ensure a mix of tenures and dwelling sizes in developments. The proposal provides a wide range of accommodation from a studio through to a 3 bedroom flat. It is not practicable to have a mixture of tenures in a scheme of this scale. Policy H DM1 is met. |
|------|--|

Parking

- 7.26 The proposal was almost universally welcomed at the public consultation event with the principle concern that the scheme provides no car parking..
- 7.27 As set out in the accompanying Transport Statement (TS), the site is well located to encourage the use of alternative modes of transport and the scheme includes secure, internal cycle storage facilities.
- 7.28 The TS sets out that the proposed 27 flats will generate comparable traffic generation to the existing hotel, nightclub and 10 flats (only 23 additional movements over a 24 hour period). There is a reduction in parking requirement if the 27 flats are compared to the hotel plus 10 flats using West Sussex parking standards.
- 7.29 Both 2015 and 2017 residential conversions provided no parking with the 2017 officer report stating: "WSCC Highways have not raised any objections to the application. In respect of parking, they consider regard should be had to the former use of the building as a hotel and the location of the site in a highly sustainable urban area. Therefore, residential occupiers would not need to own a car to access local services, facilities and sources of employment. It is also noted that the previous hotel use did not offer any parking facilities for staff or guests. WSCC do not consider that the lack of parking will have any impact on the safety of the local road network."
- 7.30 Neither a return to the hotel + 10 flats nor the 2015 nor the 2017 conversion schemes has attracted an investor/developer willing to convert/refurbish the building. The site, quite simply, has no space for provision of parking unless part or all of it is demolished. If there is to be any future use of the building it can only be with a scheme that has no parking.
- 7.31 Whilst concern regarding parking is recognised, this is an issue upon which the application scheme cannot compromise as there is no space for provision.
- 

- 7.32 The site cannot meet parking standards but:
- i) The 27 flats generate a lower parking requirement than the existing lawful use
 - ii) The site is well located to encourage the use of alternative modes of transport.
 - iii) Future occupiers will be made aware of the absence of on-site parking, the availability of cycle parking and public transport facilities.
 - iv) Permission has previously been granted for conversion to flats with no parking.
 - v) The only means to provide on-site would be part or total demolition of a valued heritage asset.

Design

- 7.33 The main part of the scheme involves restoration and conversion of an existing heritage building to which alterations have been minimised. The extensions are in a simple contemporary style that takes a lead from balconies and front façade of the main hotel. The accompanying Design & Access Statement goes into greater detail and concludes that the extensions are sympathetic, an iconic building will be restored and that the removal of unsympathetic modern additions will enhance the building.

Neighbour Impact

- 7.34 The main part of the scheme involves conversion of the existing building using existing window openings so far as practicable so that there is no material impact on neighbouring amenity.
- 7.35 The proposed 2nd and 3rd floor extensions to the former Jack Rabbit Slims part of the building does have the potential to impact on neighbouring property so that applicants instructed preparation of a Sunlight & Daylight report to accompany the application. The report concludes: "Overall the proposed development will have a very minor impact on the daylight currently enjoyed by the surrounding properties and no material impact on sunlight".
- 

7.36 The proposal includes internal refuse and cycle stores which means these practicalities will have no impact upon neighbours, furthermore, these replace the refuse storage that would take place from the current lawful use.

7.37 The proposed restaurant kitchen will have an internal duct to the parapet 2nd floor flat roof behind the 3rd floor extension where extract equipment can be hidden from view and the exhaust can discharge at high level. This new system will replace the existing old and unattractive duct system that has only rudimentary filtration than can be removed.

7.38 The proposal meets the requirements of D DM1 causing no material adverse impact on neighbours.

Sustainability

7.39 Policy ECC SP2 seeks to encourage the attainment of sustainable principles in all new developments. In this instance the proposal is for refurbishment and re-use (with modest extension) of an existing building that is rapidly falling into disrepair. Incorporation of many sustainable building techniques is not practicable in this type of refurbishment exercise as a principal objective is to retain and enhance the existing building.

7.40 The proposal represents sustainable development as it makes new use of an existing heritage building that is currently vacant to provide 27 residential flats (net increase of 17) and a new restaurant with minimised new build thereby minimising the embodiment of carbon in building materials and the use of energy in demolition and recycling/disposal of the existing.

Heritage

7.41 The accompanying Heritage Statement identifies the site as a non-designated asset within a Conservation Area. The Statement sets out the history and context to assess the significance of the assets and impact of the proposal.

7.42 The Statement concludes “Overall it is considered that the proposed development would enhance the heritage asset that is the Conservation Area, compared to the existing appearance of the site...” and “..the impact on the locally listed building that is the application property would be beneficial and secure its long term future as a notable building on Bognor’s seafront.”

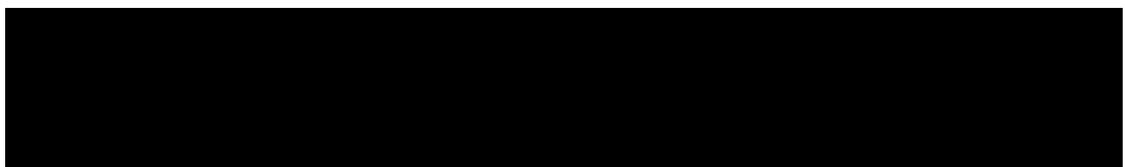


- 743 NPPF para 192 states that decision makers should take account of the desirability of putting heritage assets to “viable uses consistent with their conversion” and para 196 introduces the term “optimum viable use” the securing of which is a public benefit that should be weighed against any harm. The existing hotel has been vacant for some years and has been allowed to fall into disrepair, it has failed to attract a hotel operator and the use is no longer a viable means to secure its future. There are very limited possible alternative uses for the building only possible office or residential uses. The local office market would not support the conversion costs, leaving only residential use. The 2015 and 2017 residential schemes have failed to attract interest whereas the current scheme is supported by a purchaser of the property. Therefore, it is concluded that the proposal represents the optimum viable use of the premises.

7.44 The requirement of policy HER DM2 to respect heritage assets preserving features of particular interest is met and the NPPF para 196 and 197 (Conservation Area and non-designated asset respectively) tests are passed as there is enhancement of the assets and any less than substantial harm is clearly outweighed by the benefit of securing the refurbishment and optimum viable use of the site.

Pagham Harbour SPA

- 7.45 The Council has a mitigation procedure in place to protect against adverse impact on the SPA, this is applicable to all development within 5km, the site falls within this zone.
- 7.46 The applicants are willing to enter into a s.106 Agreement to secure an appropriate contribution.



8.0 CONCLUSIONS

- 8.1 The scheme will bring a currently deteriorating heritage asset back into optimum viable use providing the investment needed to repair years of neglect and restore the iconic façade.
- 8.2 The proposal provides a modest but welcome contribution toward meeting housing need in a highly suitable location close to the town centre with good access to public transport facilities.
- 8.3 The principle of loss of the hotel and nightclub has already been established but the current proposal provides a new restaurant to complement the seafront and provide a new facility for the area.
- 8.4 At public consultation the most widely expressed concern was regarding the absence of parking provision. However the applicants can only provide onsite parking if part or all of the building is demolished, a heritage loss that is unlikely to be acceptable. All new occupiers will be aware of the absence of on-site parking, the proximity of the town centre, availability of secure cycle parking and the nearby public transport links.
- 8.5 The proposal fully complies with NPPF and benefits from the presumption in favour of sustainable development. The proposal complies with all Local Plan policy except the imposition of minimum floor areas for dwellings – compliance with those standards would render the scheme not viable and repeat the errors of previously approved un-viable schemes that have left the building to fall into disrepair.
- 8.6 The proposal will provide high quality new housing in a renovated heritage building together with a vibrant new commercial use, planning permission should be granted.

