



St. Joseph's, Bognor Regis

TRANSPORT STATEMENT

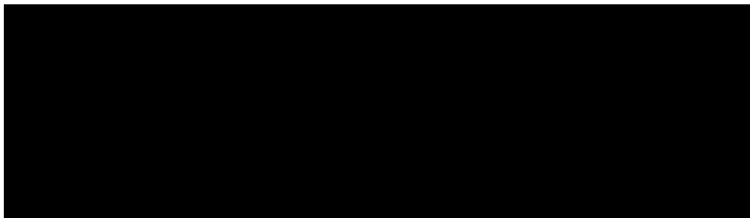
Report, December 2016

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JMP Consultants Ltd
27-32 Old Jewry
London
EC2R 8DQ
T 020 3714 4400 F 020 3714 4404 E london@jmp.co.uk



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1 Introduction

GENERAL

- 1.1 JMP Consultants Limited (JMP) has been commissioned to provide transport and highways advice in connection with the proposed re-development of St. Joseph's, Essex House (1-2 Walton Road), Blackbird Cottage and a standalone conservatory to the east of Beach Lodge (the Site).
- 1.2 The Local Planning Authority is Arun District Council and the Local Highway Authority is West Sussex County Council.

PROPOSED RE-DEVELOPMENT

- 1.3 The proposed redevelopment comprises the change of use of the buildings listed to a Sui Generis House in Multiple Occupation (HMO) for team member accommodation connected to Butlins Bognor Regis. It is expected to accommodate 90 team members and an on-site manager.

PRE-APPLICATION

- 1.4 A pre-application letter from Arun District Council dated 14th October 2016 was supportive of the proposal as it was considered beneficial to the local economy by reason of freeing up space on the Butlins complex and enabling investment in new facilities; it is also thought to protect existing jobs and bring about future employment opportunities. West Sussex County Council (WSCC) also agreed that the site is in a sustainable location with Butlins only a short distance to the east of the Site.
- 1.5 WSCC welcomed mitigation measures for noise and noise pollution as well as the creation of a Travel Plan to mitigate against any adverse transport affects. It is noted however, that no additional off-street parking will be created and, as per the Ashley House scheme (ref: BR/100/16/PL), the staff members who would reside at the proposed development have low car ownership levels.
- 1.6 This Transport Assessment addresses the pre-application advice from WSCC and sets out the highway, traffic and transport aspects of the development. The pre-application response letter can be found at **Appendix A**.

REPORT STRUCTURE

- 1.7 The Transport Statement will cover the following chapters:
- **Section 2: Policy Analysis** – Review the current and emerging land use and transport planning policies at national, regional and local government levels;
 - **Section 3: Baseline Information** – Desktop assessment of the local highway network and surrounding conditions of the site;
 - **Section 4: Development Proposal** – Overview of the proposed development for team member accommodation includes the car parking, cycle parking and refuse/recycling storage;
 - **Section 5: Multi-Modal Trip Generation Assessment** – Analyses the TRICS assessment and first principle assessment undertaken for the proposed team member accommodation;
 - **Section 6: Management Strategy** – Outlines the management strategy in place at the Site to ensure that any noise generated due to un-socialable working hours as well as transport impacts will be mitigated against;
 - **Section 7: Summary and Conclusions** – Provides a summary of the TS and presents a final conclusion

1.8 All technical appendices are included at the end of this report.

2 Policy Review and Analysis

INTRODUCTION

- 2.1 This chapter reviews current and emerging land use and transport planning policies at national, regional and local government levels, and summarises how the Proposed Development complies. Reference is made to the following policy documents:

National Policy

- National Planning Policy Framework (NPPF) (2012).

Regional Policy

- West Sussex Transport Plan 2011-2026 (LTP3);
- WSCC Revised County Parking Standards and Transport Contributions Methodology 2003; and

Local Policy

- Arun District Local Plan 2003;
- Arun Local Plan 2011-2031 Publication Version October 2014;
- Arun District Council Infrastructure Delivery Plan 2015;
- Bognor Regis Neighbourhood Plan and;
- Bognor Regis Parking Strategy 2012.

NATIONAL PLANNING POLICY

National Planning Policy Framework NPPF 2012

- 2.2 The final version of the NPPF was published on 27 March 2012. It came into effect immediately, superseding all other national planning policy (except on waste).
- 2.3 The document sets out the government's economic, environmental and social planning policies for England and its expectation for their application. It is meant as high level guidance for local councils to use when defining their local and neighbourhood plans. This approach allows the planning system to be tailored to reflect the needs and priorities of individual communities.
- 2.4 The essence of the document is to support sustainable development, defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' (p.2).
- 2.5 The NPPF defines the delivery of sustainable development through three roles:
- Planning for prosperity (an economic role);
 - Planning for people (a social role); and
 - Planning for places (an environmental role).
- 2.6 It notes that to achieve sustainable development, these roles should be sought jointly and simultaneously through the planning system.
- At the heart of the NPPF is a presumption in favour of sustainable development which 'should be seen as a golden thread running through both plan making and decision taking' (Paragraph 14). In paragraph 15, it goes on to say that 'Policies in Local Plans should follow the approach of the

presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay'.

- 2.7 A sustainable transport mode is described as 'any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport' (Annex 2, p.57).
- 2.8 Paragraph 32 states that developments that generate significant amounts of movement should be supported by a Transport Statement and Transport Assessment. It goes on to state that plans and decisions should take account of whether:
- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
 - Safe and sustainable access to the site can be achieved for all people; and
 - Improvements can be undertaken within the transport networks that cost-effectively limit the significant impacts of the development. Developments should only be prevented or refused on transport ground where the residual cumulative impacts of development are severe'.
- 2.9 Paragraph 34 seeks to ensure that 'developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised'.
- 2.10 Paragraph 35 goes on to state that 'plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of good or people'. Therefore, developments should be located and designed where practical to:
- 'Accommodate the efficient delivery of goods and supplies;
 - Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
 - Create safe and secure layouts that minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
 - Incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
 - Consider the needs of people with disabilities by all modes of transport'.
- 2.11 The Proposed Development is shown to comply with regulations relating to sustainable modes of transport with Butlin's providing 20 bicycles for Team to use and encouraging sustainable travel where possible. Safe and sustainable access to the Site has also been built into the design so that it is accessible to all.

REGIONAL PLANNING POLICY

West Sussex Transport Plan 2011-2026 (LTP3)

- 2.12 The priorities within the LTP3 are as follows:
- Improvements to the A27 trunk road and complementary public transport improvements to the current bottlenecks at Chichester, Arundel and Worthing (not currently programmed) to increase capacity, improve reliability and safety and increase the competitiveness of local businesses and attract investment.
 - Programmed improvements to the A23 trunk road at the current bottleneck between Handcross and Warning lid to increase capacity and improve the safety record.
 - Maintaining the highway network.
 - Whilst major schemes are a high priority for us, they are likely to take many years to deliver. It remains important that alongside these priorities we continue to work with our community to

improve the safety record on our local roads, increase usage of healthy and sustainable modes of transport, and provide access to services.

- The LTP3 also outlines four strategies that guide the approach to maintaining, managing and investing in Transport. A number of sub-points of relevance to the Proposed Development have been noted.
- Promoting economic growth
- Improve connectivity and access to local labour markets and key centres
- Tackling climate change
- Reduce unnecessary trips by motorised vehicles and encourage the use of more sustainable modes of transport
- Reduce the need to travel at all by encouraging provision of local services
- Providing access to services, employment and housing
- Ensure accessibility is a central consideration when planning local services
- Seek to ensure that places of work, education, leisure and food retail opportunities
- Improving safety, security and health

- 2.13 The Proposed Development complies with regulations outlined as it reduces the need for unnecessary vehicle trips by providing a shuttle bus that Team Members can use to get to and from the Butlins Resort, if required.

WSCC Revised County Parking Standards and Transport Contributions Methodology 2003

- 2.14 The Revised WSCC County Parking Standards and Transport Contributions Methodology (2003) form part of the Supplementary Planning Guidance adopted by West Sussex County Council in November 2003. It sets out:
- Revised parking standards for all development use classes; and
 - A contributions methodology to be applied to commercial and residential development.
- 2.15 The cycle parking standards states that 2 cycle parking spaces per dwelling (2 beds or more) +1 space per 8 dwellings for visitors should be provided. 1 space per dwellings (1 bed) and 1 space per dwellings + 1 space per 8 dwellings for visitors. These standards are a minimum and represent an increase in previous standards.
- 2.16 In addition to providing the correct cycle parking provision, all cycle parking must be shelters and secure and in accordance with local guidance or best practice design. However, flexibility and innovation will be encouraged. It is essential that cycle parking is considered carefully within the design of new developments.
- 2.17 The Proposed Development complies with this policy as the development has been carefully designed to ensure that secured and covered cycle parking is accessible to all residents.

LOCAL PLANNING POLICY

Arun District Council 2014 – Minor Modifications to the Local Plan

- 2.18 A schedule of minor modifications has been made to the Arun Local Plan following Local Plan Sub Committee: 31st July 2014 and Full Council: 10th September 2014 compared to the Publication Version (Regulation 19) (February 2014) and the intended Remaining Chapters.
- 2.19 The majority of these modifications are minor and relate to spelling changes and word variations.

Arun District Local Plan 2003

- 2.20 The Arun District Local Plan 2003 was adopted on the 17th April 2003 and covers the period up to 2011 when the new local plan takes over. It forms a statement of Arun District Council's planning policies which will be used as a basis for decision making in planning application. It consists of a written statement, and Proposals Map which itself includes several smaller 'Insert Maps'.
- 2.21 The key aim of the plan is to apply the principles of sustainable development in assessing development proposals, striking the balance between the need for development and the protection of scarce resources. Policies and proposals within the plan seek to guide development to meet needs, such as economic regeneration and housing, and ensure the provision of appropriate infrastructure, whilst protecting previous resources such as the countryside, open spaces and sites important for nature conservation.
- 2.22 The Local Plan is split into four sections:
- Section 1 - General Policies
 - This sets out the Council's objectives and the general policies with which the Council would expect development proposals for any sites anywhere within the District to comply. These policies underlie all other policies in the Plan.
 - Section 2 - Area Policies
 - Sets out policies for specific areas and locations and will apply to development proposals within these areas. (The areas are indicated on the Proposals Map)
 - Section 3 - Specific Development
 - Sets out policies applicable to specific types or forms of development, with which the Council would expect any proposals which include one or more specified types/form of development to comply.
 - Section 4 - Land Allocations
 - Sets out the Council's site specific proposals and allocations for various sites within the District and the policies with which it would expect development on those sites to conform.
- 2.23 The Proposed Development is policy compliant as it is a sustainable development that utilises the existing buildings to meet the needs of the Butlin's Team Members.

Arun Local Plan 2011-2031 Publication Version

- 2.24 The Arun Local Plan 2011 – 2031 Publication Version sets out the Council's vision for the development of Arun up to 2031. The Plan covers the Arun Local Planning Authority Area (LPA). The LPA is Arun District Council administrative area excluding land within the South Downs National Park Authority boundary. This document was submitted for independent examination on 30th January 2015.
- 2.25 The Arun Local Plan contains strategic and development management planning policies, which will shape the future of the area and will be used in the consideration of planning applications.
- 2.26 The Local Plan's strategic vision is underpinned by 'objectives' which set out aspirations for how Arun can change over the Plan period. It also contains a suite of strategic and more detailed policies which aim to achieve the vision and objectives. It promotes and guides private and public sector investment and neighbourhood planning. The Local Plan's 'strategic policies' set out the overall strategy for the Arun Local Planning Authority with regard to:
- The amount of new employment, retail and housing development that will take place in the District up to 2031;
 - A strategic framework to help determine planning applications;
 - The framework for neighbourhood development; and

- A statutory guide to help local communities deliver local change.

2.27 The West Sussex Transport Plan 2011-2026 identified key transport issues in the District including:

- Road congestion during peak hours which causes disruption and air pollution especially on the A27 at Arundel, the A29 and A259;
- Level crossings on the A29 and the A284 cause delay between the A27 and the main towns of Bognor Regis and Littlehampton;
- Lack of safe crossing points along the main routes through the District causes community severance;
- Rail services between both Littlehampton, Bognor Regis and London are perceived as slow and upgrades to improve accessibility to rail stations are required;
- The current provision of pedestrian and cycling facilities is disjointed and suffers from inadequate signage, crossing points and poor surfacing;
- The Public Right of Way (PROW) network linking the South Downs National Park with the coast is also disjointed and deficient in bridleway access and requires surface enhancements; and
- Due to low use of some services, there is uncertainty over the future viability of some bus services.

2.28 Policy T SP1 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 onto the highway network; contributed to highway improvements and promotes sustainable transport, including the use of low emissions fuels, public transport improvements and the cycle, pedestrian and bridleway network.

2.29 Policy T SP1 aims to promote sustainable transport, promote efficient use of existing transport network and reduce congestion on the highway, promote the use of low-carbon energy and promote healthy lifestyles. The Proposed Development works towards these outcomes through the provision of cycle parking on Site as well the hybrid shuttle bus and the lack of car parking provided.

2.30 The Proposed Development is policy compliant as it aims, as far as reasonably practical to encourage sustainable transport to and from the Site and the use of low emission fuels, through the provision of bicycles and a hybrid shuttle bus that can be used by residents.

Arun District Council Infrastructure Delivery Plan 2015

2.31 Parsons Brinckerhoff (PB) were commissioned by Arun District Council to produce an update to the infrastructure Delivery Plan (IDP). This forms part of the evidence base to support Arun's emerging Local Plan. This IDP is an updated version of the draft IDP published in April 2013, which was based upon the proposed growth planning through the emerging draft Local Plan (2013).

2.32 Arun District Council is required to demonstrate that the policies and proposals outlined in the Local Plan are deliverable. To this end, it is necessary to understand the infrastructure that is required to support the anticipated development and growth across the district.

2.33 The purpose of the IDP is to set out these infrastructure requirements and also facilitate an on-going partnership approach with infrastructure providers. The IDP has been produced using the best available information to date. Due to the nature of infrastructure planning, however, it should not be expected that every piece of infrastructure identified in the plan will be delivered.

2.34 The Proposed Development is policy compliant as it aims to support development and growth within the district. By moving team members off-site Butlins can expand their existing premises and promote growth through increased employment opportunities through an increase in potential customers.

Bognor Regis Neighbourhood Plan (2015)

- 2.35 Bognor Regis Neighbourhood Plan was adopted in 2015 and forms part of Arun District Councils Local Planning Policy Framework, to be used to help make planning decisions. The policies forming this document are a material consideration when planning applications are decided upon. The Neighbourhood Plan intends to:
- Provide a vision for the future of the area, based on evidence of what is needed and what makes the local area distinctive;
 - Translate this vision into priorities and policies to guide future development, the allocation of land and resources, and investment;
 - Support other priorities for the area – such as the local economy, improving transport, building better homes and action on climate change.
- 2.36 The Butlins Bognor Regis resort is cited in the text and highlights the significant investments planned for the future that aim to increase hotel capacity and improve Butlins 'relationship' with the seafront and the town.
- 2.37 Sustainable Travel is a key policy in the document and highlights the need for development proposals to maintain and extend, where possible, emerging networks of: rights of way, cycle routes and pedestrian facilities in the town. Any development with significant traffic impact shall be required to contribute to improvements to the pedestrian and cycle networks, as well as parking and shared space area. Applications are encouraged to seek practical and early advice from the District Highway Authority at West Sussex County Council, the Town Centre Manager, the planning team at Arun District Council and the Town Council.
- 2.38 Any parking provided as part of a development need to be adequate and proportional to the development and ensure that seasonal fluctuations do not impact on existing parking provision.

Bognor Regis Parking Strategy 2012

- 2.39 The objectives of the Bognor Regis Parking Strategy are to:
- Guide the management and provision of parking in the town centre;
 - Ensure future parking provision complements future development whilst meeting the needs to the town's residents and visitors; and
 - Contribute to the viability and prosperity of Bognor Regis.
- 2.40 MVA consultancy on behalf of the council undertook a review of the car parks in the area, the main access route and their capacity and stress. They found that the Proposed Developments in the area could lead to a seasonal shortage of spaces, especially as any underground parking is limited by water table issues.
- 2.41 The Proposed Development should not lead to the need to park in any car park situated around Bognor Regis. Car parking whilst not provided on Site is to be provided at the Butlins site for those that need it, the on-site manager will have access to one on site car parking space.

3 Baseline Conditions

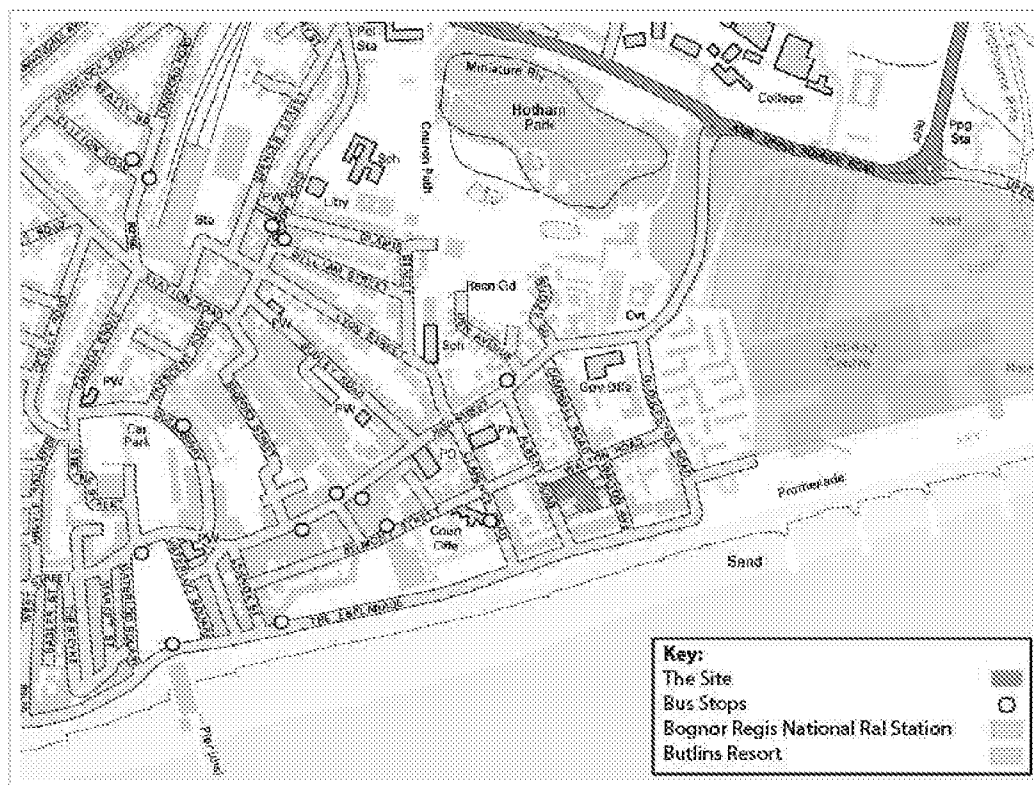
GENERAL

- 3.1 This section provides information on the existing Site and the surrounding area, with a focus on local transport infrastructure and services.
- 3.2 Baseline conditions need to be accurately established to fully understand the context of the proposed redevelopment and the associated traffic and transport implications. This is informed by desk based research.

SITE LOCATION AND EXISTING LAND USES

- 3.3 The development Site is located to the east of Bognor Regis in West Sussex approximately 150m from the Butlins resort. It is bound by Walton Road to the north, Walton Avenue to the east, Albert Road to the west and a residential development names Esplanade Grande to the south which looks over the promenade.
- 3.4 The Site to be developed is comprised of three separate buildings and empty land. The land uses are as follows:
- **St. Joseph's** – A three to four storey building, formally a care home (class C2), with a total of 25 bedrooms as well as a chapel. It is physically connected to 1-2 Walton Road at Ground Level. There is a small parking area on the western side suitable for 4-5 cars.
 - **1-2 Walton Road** – A two storey terrace of two dwellings with additional accommodation in the roof. It is part flint and part light grey coloured brick. Part of the terrace has been extended at ground and first floor level to the rear.
 - **Blackbird Cottage** – A two storey detached dwelling with 13 bedrooms. There is also a smaller single storey standalone building at the rear.
 - **Conservatory** – Located to the rear of Beach Lodge, this is a free standing conservatory with adjacent free standing kitchenette.
- 3.5 The Site has gardens to the rear of the buildings which are shared amongst all of the properties and provide for a central courtyard-like space. There is also a freestanding bus shelter type smoking area adjacent to the boundary with Pearlfishers, a building outside the blue line boundary that is not part of this development.
- 3.6 A Site location plan, showing the Site in context to the wider area can be seen in **Figure 3.1**.

Figure 3.1 Site Location in Context



- 3.7 Access to St. Joseph's is off Albert Road, access to 1-2 Walton Road is off Walton Road and Blackbird Cottage can be accessed via Walton Avenue. The Site is surrounded mainly by residential dwellings of which most have off-street parking. There is no off-street parking associated with the three buildings set for redevelopment.

LOCAL HIGHWAY NETWORK

Albert Road

- 3.8 Albert Road is a two way single carriageway road and leads to The Esplanade in the south and the High Street in the north. It has a speed limit of 30mph with street lights along the entirety of the road. Albert Road is within a Controlled Parking Zone (CPZ) with designated parking bays along certain stretches. The CPZ restricts parking between 09:00 and 17:00 Monday to Saturday. Visitor parking bays are also located on street which restricts parking to between 09:00 and 17:00 Monday to Saturday with a 2 hour limit.

Walton Road

- 3.9 Walton Road is a two way single carriageway street, forming a junction with Albert Road at the northwest corner of the Site. The speed limit is 30mph and both sides of the carriageway have on street parking spaces which reduce its effective width. It is within the same resident parking zone as Albert Road and has a small number of visitor parking spaces.

Walton Avenue

- 3.10 Walton Avenue is a two way single carriageway street forming a junction with Walton Road in the northeast corner of the Site. On street parking reduces the effective width of the carriageway and it is located in the same CPZ as Albert Road.

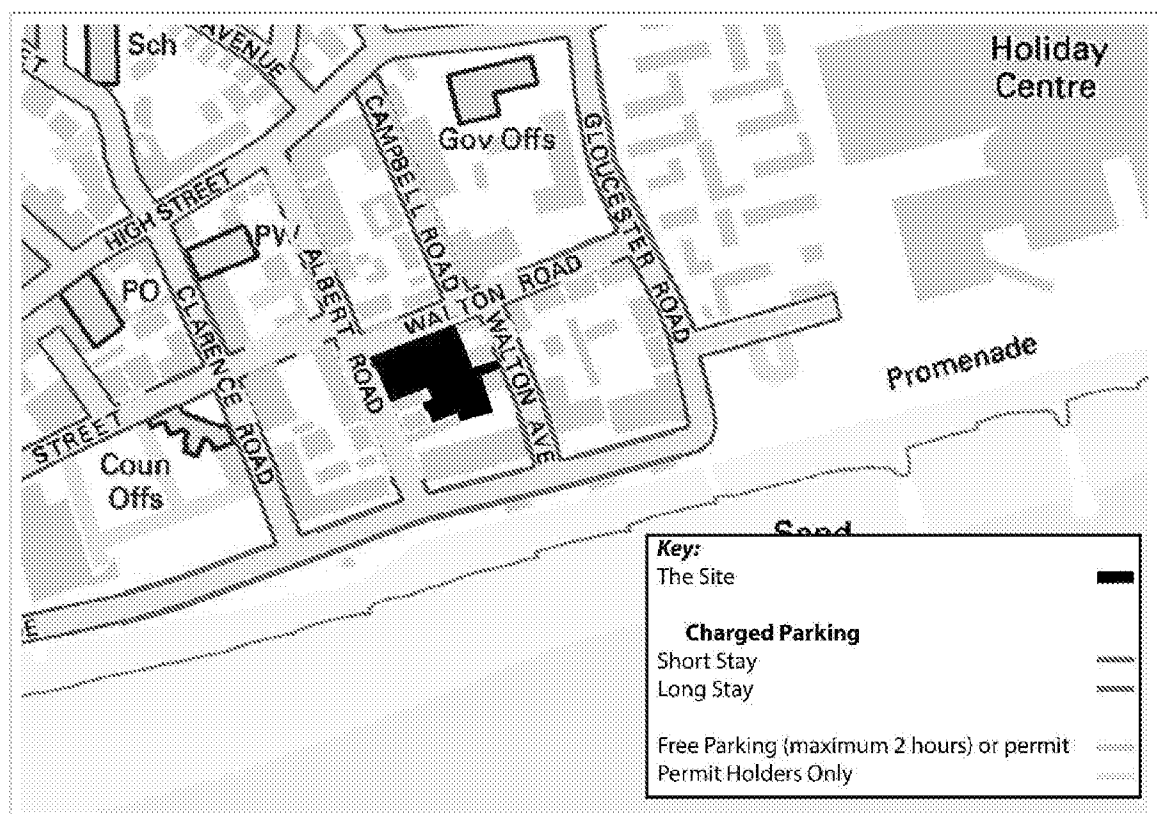
LOCAL FACILITIES

- 3.11 The Site is located less than 150m from the High Street which is a local amenity area and has a number of local shops and services. The High Street also connects the Site to the town centre and railway station.

ON-STREET PARKING

- 3.12 There is a mixture of permit, pay and display and unrestricted parking in the vicinity of the Site, with the majority being permit or pay and display spaces. The "permit only" spaces restrict parking to between Monday to Saturday 09:00-17:00. Pay and Display spaces are restricted to paying customers only Monday to Sunday 09:00-17:00 excluding bank holidays, at a charge of 90p per hour.
- 3.13 A map of the on-street parking space availability in the roads surrounding the Site can be seen in **Figure 3.2** below.

Figure 3.2 On-Street Parking



PUBLIC TRANSPORT

National Rail

- 3.14 Bognor Regis National Rail Station is located approximately 800 metres to the northwest of the Site and links to the Site to towns and cities across the South Coast including Brighton and Littlehampton as well as London Victoria and Gatwick Airport.

Bus Services

- 3.15 The closest bus stop to the Site is located on High Street to the north of the Site, forming a junction with Albert Road. This stop serves the routes 67, 600, U7 and the 700 coastliner. The stop has no shelter and is simply a bus flag with timetables, this can be seen in **Figure 3.3** below.

Figure 3.3 Bus Stop on High Street



- 3.16 A full breakdown of the bus stops and routes that serve the site can be seen in **Table 3.1** below.

Table 3.1 Bus Services and Route

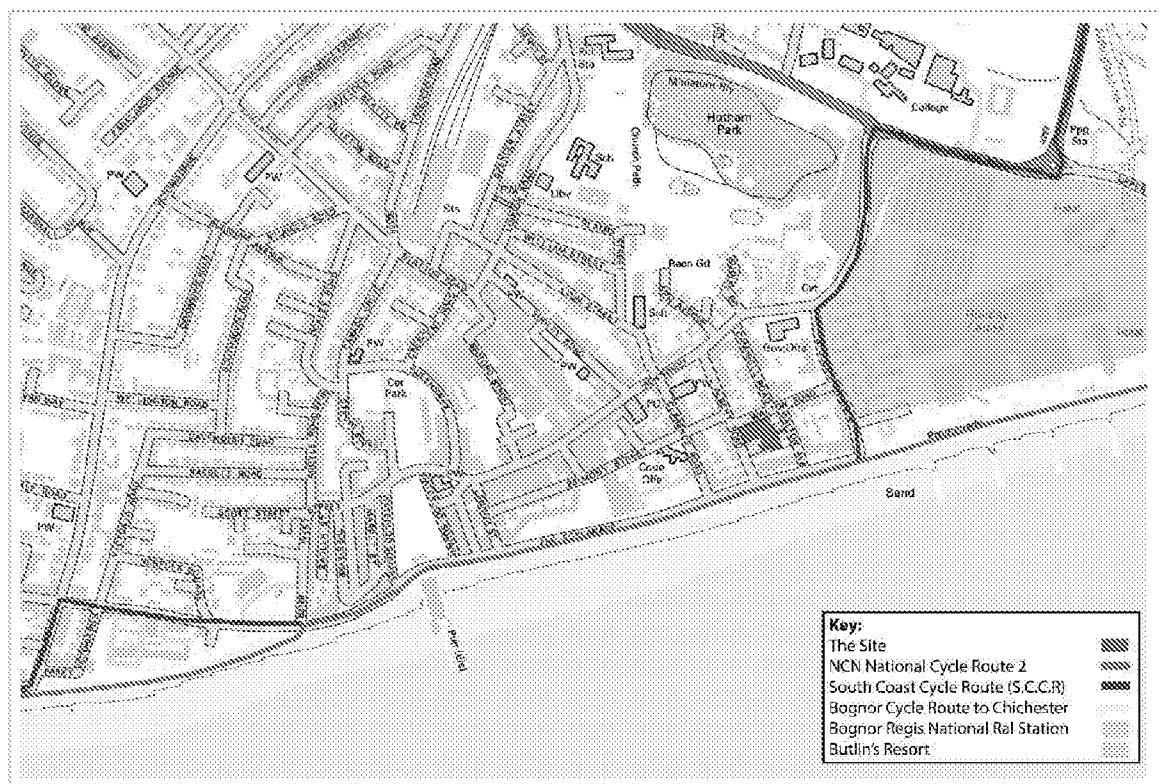
Route	Bus Stop	Distance	Locations Served
67	High Street	150m	Bognor to Felpham
600	High Street	150m	Elmer to Chichester via Pagham
U7	High Street	150m	Bognor to Chichester
700 Coast liner	High Street	150m	Littlehampton to Chichester via Yapton
660	Town Hall	160m	Bognor to Chichester
1	High Street (Stop B)	480m	Bognor to Amberley

61	Town Hall	160m	Bognor to Aldwick
62	Town Hall	160m	Bognor to Nyetimber via Aldwick
141	Hotham Park	650m	Yapton to Bishop Luffa School via Bognor
Bus Star	Post Office (Stop O)	320m	Bognor to Bersted

Cycle Facilities

- 3.17 National Cycle Route 2 as well as the South Coast Cycle Route (S.C.C.R), a Local Cycle Network, run in close proximity to the Site. These routes connect cyclists to Brighton, Horsham, Portsmouth and Chichester. The routes and their proximity to the Site can be seen in **Figure 3.4**.

Figure 3.4 Cycle Routes in the Vicinity of the Site



4 Development Proposals

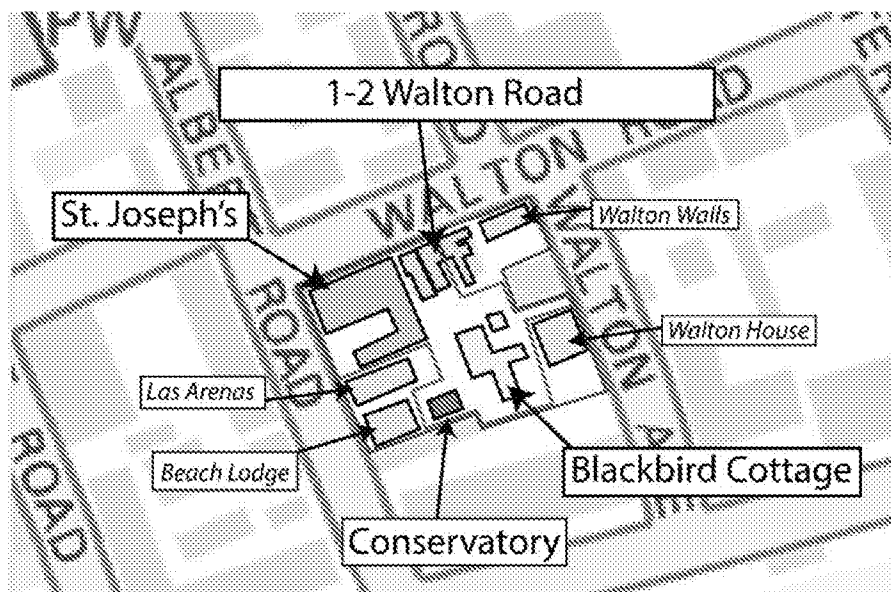
GENERAL

- 4.1 This section of the Transport Statement assesses the Proposed Development including the proposed land uses, car and cycle parking provision.
- 4.2 The general floor arrangement drawings, as prepared by Randell Design Group, are included at **Appendix B**.

PROPOSED DEVELOPMENT

- 4.3 The proposals are to redevelop the existing buildings into one Sui Generis residential property to be leased by Butlins for their team accommodation on a long term basis. The team accommodation will cater for up to 90 team members and one on-site manager in total at the Site. There will also be private accommodation for an on-Site manager who will have a key role and a wide range of responsibilities including Site manager, concierge, housekeeping, maintenance and ensuring that the rules and regulations within the Team Accommodation Agreement are kept to. The room's usage and occupancy levels will differ between seasons (peak and off-peak period for Butlin's).
- 4.4 Butlin's are redeveloping their resort at Bognor Regis, which will result in the removal of the existing team member's accommodation. Butlin's are looking for off-site accommodation for team members where they can have an improved work/life balance. The existing team accommodation, which is within the 1960's buildings at the Resort, is of poor quality compared to the accommodation Butlin's are looking to secure at the development Site, this will ensure that Butlin's can secure the skilled professional employees they require to invest in the resort.
- 4.5 It is noted that these proposals are similar to that of Ashley House, another site selected for team accommodation. This was approved with conditions by Arun District Council on 10th August 2016 (ref: BR/100/16/PL).
- 4.6 A plan showing the buildings designated for redevelopment can be seen in **Figure 4.1** below.

Figure 4.1 Redevelopment Site Plan



- 4.7 There will be no structural changes to the buildings and minimal external alterations, the existing structures will simply be adapted into a HMO, in other words they will still operate as three separate buildings but with a common land use.
- 4.8 The conservatory will have restricted opening times to between 08:00 and 19:00.

ACCESS STRATEGY

Vehicular Access

- 4.9 There is an existing vehicular access into St. Joseph's off Albert Road which has the capacity for a maximum of four cars including one disabled space. The Proposed Development will re-design the parking area to accommodate two car parking spaces including one disabled and a dedicated minibus space.
- 4.10 Swept path analysis of the minibus entering and exiting the site can be seen at **Appendix C**. It is noted that when the minibus is parked on Site there is no access to the disabled space from the crossover within the red line boundary, however, it is not intended for the minibus to park in the space other than to pick up/drop off residents (the minibus will be kept at the main Butlins site when it is not in use). This will be managed by the on-site caretaker. As well as this, within the blue line boundary of the site, there is another adjacent vehicular access which can be utilised, if necessary, by the disabled driver, providing constant access to the space.

Pedestrian Access

- 4.11 Pedestrian access to the Site can be gained from Albert Road, Walton Road and Walton Avenue, utilising existing access points into the three developed buildings. All access points will be gated and secure.
- 4.12 It is noted that restricted access will operate from Walton Avenue.

DELIVERY AND SERVICING

- 4.13 All team members will be provided with meals at the resort, though they will also have access to kitchen facilities on Site.
- 4.14 All postal deliveries will be taken to the Butlins resort and team members will collect their post from there. No postal deliveries will be accepted on Site, as per the arrangements at Ashley House. The team member accommodation will effectively form part of the resort, as currently is the case, in terms of servicing and delivery activities.
- 4.15 Waste provisions will be split across 8 x 1100 litre bins, six located near St. Joseph's and 2 near Blackbird Cottage. In total 8800 litres of waste storage will be provided.
- 4.16 Refuse and recycling collection will continue as per the existing arrangements, the manager/caretaker will be responsible for ensuring the refuse bins are ready on the day of collection.

PARKING

Butlin's Car Ownership levels

- 4.17 The total level of car ownership for the team members who currently reside on the resort is 0.09 vehicles per Team Member. Currently 45 vehicles are parked at Butlins for 470 Team Members. This is extremely low which is largely due to the type of people that are employed at the resort and the work that is undertaken which means a majority of team members do not require their own vehicle. This therefore

shows that even though the scheme will have no off-street parking for residents, there will be very few team members with vehicles wishing to park them at the resort.

Car Parking

- 4.18 Butlin's Team members will have sufficient provision to park their vehicles at the Butlin's Resort. . The Revised County Parking Standards and Transport Contributions Methodology 2003 state that HMOs should provide 0.5 spaces per room/unit. There will be up to 90 team members residing at The Development Site and therefore 45 parking spaces meet the 0.5 space per room/unit standard. This was agreed at pre-application discussions with Arun District Council who noted that due to the proximity of the Site to Butlins it would be acceptable to make parking provision within the Butlins site rather than the development site, as long as it did not encroach on existing parking arrangements. To protect against overspill, members private parking at Butlins will be monitored and if they do not park in the correct location it will count as a strike, as per their contract.
- 4.19 It is noted that due to the proximity of the Site and the low car ownership levels it is not expected that the residents will own cars or need to use them to get to the resort. However, all team members will have to sign an agreement communicating a 3 strike policy for contravening the agreement- which will include vehicles associated with team members parking on site or locally.
- 4.20 Team members will have a multitude of options to easily and conveniently travel to the Butlin's Resort through sustainable modes as discussed in this report.

Cycle Parking

- 4.21 Due to the lack of space within the development site for sufficient cycle storage to cover the needs of all residents Arun District Council stated they would have no objection for sufficient cycle parking to be provided within the Butlins site instead.
- 4.22 In the WSCC Revised County Parking Standards and Transport Contributions Methodology 2003, there are no specific cycle standards for HMO's. For residential accommodation, it is noted that there should be 2 cycle spaces per dwellings (2 beds or more) and 1 space per 8 dwellings for visitors. There should be 1 space per dwellings (1 bed) and 1 space per 8 dwellings for visitors. Given the type of HMO accommodation and the shared rooms it is not considered that there would be a significant level of visitors to/from the site, especially given the shift patterns of team members.
- 4.23 There are 43 existing cycle parking spaces on the Butlin's Resort, which Butlins have noted are rarely full as currently all team members reside on the resort. This cycle parking will be monitored in line with the Ashley House and St. Josephs Travel Strategy to ensure that demand is met.
- 4.24 Emergency cycle parking will be provided on Site, as per the recommendation from Arun District Council. 20 cycle parking spaces will be provided in two locations across the Site, split 10 and 10 in each store.

SUMMARY

- 4.25 It is considered that the site is appropriate for the proposed use as Team Member accommodation associated with Butlin's Resort, which is approximately 150m from the site. Details have been provided for car and cycle parking on the Butlin's Resort as well as at the development Site given that Butlin's will be taking a long lease of the development site and therefore provision at the resort is integral to the Proposed Development.
- 4.26 Butlins will employ strict management policies at the site and a Site manager will reside at the development Site to ensure the management policies and accommodation agreement that all team members have to sign are adhered to.

5 Multi-Modal Trip Assessment

GENERAL

- 5.1 This section provides a summary of the trip generation exercises that have been conducted to provide an estimate of trips that are expected to be associated with the Proposed Development.
- 5.2 A trip generation assessment has been carried out for the Proposed Development in order to determine the total number of trips expected as a result of the Proposed Development. Data has also been extracted from TRICS® and from local 2011 Census data with regard to the anticipated modal split of person trips; these sources of data are compared below.
- 5.3 Trip generation results have been derived using the latest version of the industry standard TRICS® database (TRICS® 2014 (a) v7.3.3) to predict trip generations based on similar sites to the individual land uses within the proposed development. The selected sites have been based upon similar locations, parking provisions and public transport accessibility characteristics to the Proposed Development.
- 5.4 Given the unusual nature of the proposed team members accommodation there are no TRICS sites directly applicable to the sui generis use. TRICS analysis using student accommodation has been chosen as the next best alternative to provide a sensitivity test when compared to the first principles analysis.
- 5.5 Outputs from the TRICS assessments are contained at **Appendix D** of this report. Unless otherwise stated, any errors in arithmetic tables are due to rounding.
- 5.6 For information, "personal travel" is defined as being any travel undertaken outside of working hours, not associated with Butlins.

EXISTING SITE

- 5.7 The existing site comprises of a care home with ancillary accommodation. Following research within TRICS, it has been determined that the ancillary accommodation can best be represented using data from private flats. It is noted that this approach will over-estimate vehicle trips as those previously residing within the ancillary accommodation will have been less likely to own a car than the typical residents of private flats, however, the Site is within a Controlled Parking Area therefore resident parking is restricted. This has been taken into account in the site selection process.

Care Home (Elderly Residents)

- 5.8 The following criteria were used to find suitable sites in TRICS:
- Land Use: Health (05);
 - Category: Care Home (Elderly Residential) (F);
 - All regions excluding Greater London, Wales, Scotland and Ireland;
 - Data range: 01/01/08 to 24/10/13; and
 - Weekday surveys only.
- 5.9 The above criteria yielded two suitable sites, as seen in **Table 5.1** below.

Table 5.1 Selected Sites

Reference	Description	Area	RESIDE
EX-05-F-01	NURSING HOME	ESSEX	17

HF-05-F-02	NURSING HOME	HERTFORDSHIRE	25
WK-05-F-01	NURSING HOME	WARWICKSHIRE	32

TRICS (V7.3.3)

- 5.10 The above sites presented a trip rate per resident, once scaled up to 25 residents, as per the existing site, a total trip rate for the care home was produced. These can be seen in **Table 5.7** below.

Table 5.2 Care Home Trip Rate (25 residents)

Mode	AM In	Am Out	PM In	PM Out	Total In	Total Out
Vehicles	1	3	1	2	31	34
Cyclists	0	0	0	0	1	1
Vehicle Occupants	2	3	1	2	38	42
Pedestrians	1	2	0	0	16	16
Bus	0	1	0	0	2	2
Rail	0	0	0	0	0	0
Public Transport	0	1	0	0	2	2
Total Person	3	6	1	3	56	61

- 5.11 **Table 5.7** shows that the residents are mainly occupants in a vehicle with a modal share of 68%, with vehicular travel being the second highest at 56%. None of the resident use National Rail services and in total 4% use public transport. This is expected to be representative of the existing site.

Privately Owned Flats

- 5.12 The following criteria were used to find suitable sites in TRICS:
- Land Use: Residential (03);
 - Category: Flats privately owned (C);
 - All regions excluding Greater London, Wales, Scotland and Ireland;
 - Data range: 01/01/08 to 24/10/13; and
 - Weekday surveys only.
- 5.13 The above criteria yielded two suitable sites, as seen in **Table 5.1** below.

Table 5.3 Selected Sites

Reference	Description	Area	RESIDE
DS-03-C-01	BLOCK OF FLATS	DERBYSHIRE	8
EX-03-C-01	FLATS	ESSEX	6
DS-03-C-01	BLOCK OF FLATS	DERBYSHIRE	8

TRICS (V7.3.3)

- 5.14 The above sites presented a trip rate per resident, once scaled up to 22 flats, as per the existing site, a total trip rate for the residential aspect of the site was produced. These can be seen in **Table 5.7** below.

Table 5.4 Private Flat Trip Rate (22 residents)

Mode	AM In	Am Out	PM In	PM Out	Total In	Total Out
Vehicles	3	3	5	2	28	28
Cyclists	0	0	0	0	2	2
Vehicle Occupants	3	3	3	2	30	33
Pedestrians	0	3	3	0	24	24
Bus	0	0	0	0	13	9
Rail	0	0	0	0	3	2
Public Transport	0	0	0	0	16	11
Total Person	3	6	6	2	71	69

- 5.15 Table 5.7 above shows that residents are mainly occupants of vehicles with a modal split of 45%, the second most popular option is vehicular at 40%. Pedestrians make up 34% of trips and public transport accounts for 19%.

Cumulative Existing

- 5.16 The cumulative trip rate for the existing site can be seen in Table 5.5 below. It can be seen that the majority of users associated with the site are vehicle occupants with a modal share of 55%, vehicle use if at 48%, 31% are pedestrians and public transport makes up 12% of trips. However, as stated previously the vehicle trips are expected to be an overestimation owing to the fact that TRICS has no comparable HMO sites and so they were assumed to be flats.

Table 5.5 Cumulative Existing (Care Home & Flats)

Mode	AM In	Am Out	PM In	PM Out	Total In	Total Out
Vehicles	4	6	6	4	60	62
Cyclists	0	0	0	0	2	2
Vehicle Occupants	5	6	4	4	67	75
Pedestrians	1	5	3	0	40	40
Bus	0	1	0	0	14	11
Rail	0	0	0	0	3	2
Public Transport	0	1	0	0	17	13
Total Person	6	12	8	4	126	130

PROPOSED DEVELOPMENT

- 5.17 TRICS does not include any survey sites that would generate trip generation applicable to the specific circumstances of the Development Site. Therefore, a first principles assessment has been carried out to assess the modal split and trip generation of the Proposed Development.
- 5.18 It is noted that as the Site is connected to Butlins there will be a strict management systems along with a car free policy for all team members, excluding those requiring the use of the disabled parking space.

First Principles Assessment

- 5.19 The Development Site will accommodate up to 90 Butlins team members plus a full time on-site manager, equating to 91 residents.
- 5.20 If we assume that all 90 Butlins team members will be working at Butlins on an average day, then each team member will generate one arrival trip and one departure trip equating to 180 person trips throughout an average day. As a worst case scenario, it is assumed that team members will also be working at weekends and so the same assumption for the weekday has been extended to the weekend. Team members are not expected to make multiple trips to and from the Site throughout the day as all meals are provided on the resort. Though it is noted that due to the proximity of the Site, unlike the Ashley House accommodation, it is more likely that residents will return in the day.
- 5.21 Given the proximity of the Site to the resort it is expected that the majority of residents will walk to and from the Site to work. However, given the shift patterns team members will either start early and finish early afternoon or start mid-morning and finish late depending on their job roles, this means that team members may wish to travel by the shuttle bus for one of their journey as they are potentially in 'unsociable hours'. The shuttle bus will also be provide to help though with mobility and access problems.
- 5.22 The on-site manager will have access to a car parking space however, this is not expected to generate a large amount of additional trips owing to the fact that they will only, for their job, need to travel between the resort and the Development Site and it is expected that they will walk. A car parking space however, will be available for use at their discretion.
- 5.23 As the team members will also be living at the Site, personal trips will also be generated e.g. not associated with work. The majority of these trips are expected to be sustainable however, a higher proportion will be undertaken by public transport and vehicles, though car ownership levels are extremely low.
- 5.24 The expected mode share for residents personal and work trips can be seen in **Table 5.6** below.

Table 5.6 Travel to Work Modal Share Trips (91 residents)

Mode	Modal Share	Trips Generated
Walking	96%	87
Cycling	2%	2
Train	0%	0
Bus	0%	0
Shuttle Bus	1%	1
Vehicle Occupants	0%	0
Vehicle	1%	1

- 5.25 The majority of trips associated with the Site are expected to be undertaken on foot due to the close proximity to the Butlins resort, leading to a higher than average modal share of 96%. As a shuttle bus is in operation and the caretaker has access to a parking space on site it is assumed a 1% mode share for each mode respectively. Cycling is estimated at 2%.
- 5.26 The expected mode share for resident's personal trips can be seen in **Table 5.7** below. It is expected that the modal share for personal trips will be spread between the separate modes rather than the high proportion of walking trips. This has been based on the Butlins vehicle ownership rate and the 'TRICS' existing 'flat' modal split as well as transport facilities available to residents.

Table 5.7 Personal Mode Share

Mode	Modal Share	Trips Generated
Walking	42%	38
Cycling	2%	2
Train	16%	15
Bus	10%	9
Shuttle Bus	0%	0
Vehicle Occupants	20%	18
Vehicle	10%	9

- 5.27 In terms of personal, out of work trips, residents are expected to use varying modes of travel however, still mainly travel by foot. Rail travel is expected to have a higher utilisation due to ease of access to destinations such as Brighton, with bus travel used to connect residents to both the train station and locations such as Chichester. The Site will not generate significant vehicle trips as those residents with access to a vehicle will park it at the resort, it's expected that vehicle occupancy levels will be higher than vehicular at 20%

6 Management Strategy

- 6.1 A management strategy will be implemented at the development Site to ensure any noise generated due to un-social working hours as well as transport impacts will be mitigated against to reduce the impact on the surrounding areas.
- 6.2 Butlins will also implement a Travel Strategy and JMP have prepared a separate draft Travel Strategy, in agreement with Butlins, that will be implemented at the site, alongside the Management Plan.

BUTLINS TEAM MEMBERS SHIFT PATTERN INFORMATION

- 6.3 The type of roles that the professional team members residing at The Development Site will have are:
- **Entertainment:** Shift patterns for Entertainers depend on the type of break; whether music weekend or family break and the type of entertainment. Team member's work in shift patterns given the hours required. The earliest starting time would be 7.30am and the latest finishing time would be 11pm;
 - **Housekeeping:** 8.30am-7pm;
 - **Catering Team:** Split shifts, earliest shift is 7am until 12pm and then 4pm until 11pm;
 - **Bar Team:** Earliest start time is 9am and the latest finish time is 12am midnight. If it is a music weekend these times will alter with the earliest start time being 4pm and latest being 5am;
 - **Leisure Team:** The earliest start time will be 9am up until 6.30pm; and
 - **Shop Team:** The earliest team member's time will be 7.30am until 6.30pm.
- 6.4 It should be noted that all team members at Butlins sign a Team members Accommodation Agreement and Butlins will ensure there is a specific team members accommodation agreement that deals with specific elements of the property to minimise noise and disturbance to adjacent properties.
- 6.5 Butlins have stated that team members spend a considerable amount of their time at the resort, whether working or not they are entitled to full access of all the facilities at the resort. So, it is not thought that there will be a large amount of two-way trips throughout the day, in breaks or in-between shifts it is expected that team members will remain at the resort for social purposes. All meals are also provided at the Resort for team members with limited facilities being proposed within the kitchens at The Development Site.

BUTLIN'S TEAM MEMBERS TURNOVER

- 6.6 Butlins recruits team members on a monthly basis and the biggest intake of team members occurs before the peak season begins to ensure there are sufficient team members available. The pre-peak season intake therefore occurs at the beginning of February, middle of March, beginning of July, middle of October and the beginning of December.
- 6.7 In 2014, the team turnover was 51% however; in 2015 this has reduced to 41%. The average length of service for all team members is over 2.6 years. Butlins are focusing on reducing turnover further and the provision of new high quality accommodation, off site, where team members can have an improved work/life balance is part of the objectives to retaining team members.
- 6.8 Butlins have to compete with a number of other local employers for Team members within Bognor and further afield. Butlins are therefore looking to recruit skilled team members to suit the improvements of the Butlins Resort and moving team members to external accommodation will provide an additional attraction so Butlins can be competitive in their recruitment processes.

- 6.9 In total, there are 1,324 team members employed at the resort with 470 currently residing on the resort in existing team member accommodation. There are many additional team members who live locally as the Butlin's Resort is a large employer within Bognor Regis and local town centres and therefore these team members do not require accommodation.

MANAGEMENT

- 6.10 While all meals are provided for team members on the Butlin's Resort 7 days a week, irrespective if they are working or not, kitchens will be provided in the accommodation purely to allow team members to cater for themselves if required. Butlin's have stated that team members generally prefer to partake of the meals on the resort due to their shifts and only occasionally cater for themselves.
- 6.11 Communal facilities are provided across all three buildings with communal dining and living areas, as well as the stand alone conservatory which will be available for use between 08:00 and 19:00 only to minimise any potential disturbance to neighbours.
- 6.12 There are 15 kitchens dedicated to clusters of rooms. The kitchens within the property will have basic appliances, which are limited by Butlin's due to the fact all meals are provided, at a subsidised rate, for team members at the Butlin's Resort even when team members are not working. There is a dedicated catering and welfare team for team members at the Butlin's Resort.
- 6.13 The Development Site will have CCTV provision for security and to monitor the use of the building for Team Accommodation. Butlin's will also ensure that security team members, located at the Resort, would travel to patrol the building using Butlin's vehicles every during the night if required. This will all form part of a Management Plan for the Team member Accommodation.

ACCOMMODATION AGREEMENT

- 6.14 Butlins will ensure all team members sign an Accommodation Agreement with a set of 'House Rules' which are presented below.

Noise

- 6.15 A 'quiet time' will be set between the hours of 22:00 and 07:00 in order to ensure that section 6.9 of the Accommodation Agreement – "Not to create any nuisance or annoyance to other occupants of accommodation" – will be adhered to.
- 6.16 It is noted that a Noise Assessment will accompany this document as part of the planning application.

Access

- 6.17 Access only through the main front entrance with restricted access hours from Walton Avenue.

Guests

- 6.18 No visitors are allowed to stay overnight (Section 6.6 of the Accommodation Agreement).
- 6.19 Rooms on the resort can be booked at a discounted rate for friends and family of team members – there will be no consent given for overnight visitors in this case.
- 6.20 Visitors to The Development Site must be pre-authorised by the Team Accommodation Manager and they will be signed in/out.

Conduct

- 6.21 There will be a three strike rule within the Accommodation Agreement. If this is breached the agreement will be terminated and the team members will be asked to leave their accommodation.

Deliveries

- 6.22 No deliveries are permitted to team accommodation; all deliveries are coordinated through the main post room at the resort. Residents will need to collect any post from the main resort.

Resort Safety Officers

- 6.23 The resort safety team operate 24-7 cover at the main resort. Team are able to contact them at any time with any security concerns or complaints. This will continue at The Development Site and a resort safety officer will be able to visit the property if required (in the event that the resident Team Accommodation is in distress).

7 Summary and Conclusion

- 7.1 JMP Consultants Limited (JMP) has been commissioned to provide transport and highways advice in connection with the proposed re-development of St. Joseph's, 1-2 Walton Road, Blackbird Cottage and a standalone conservatory to the east of Beach Lodge (the Site).
- 7.2 The development Site is located to the east of Bognor Regis in West Sussex approximately 150m from the Butlins resort. It is bound by Walton Road to the north, Walton Avenue to the east, Albert Road to the west and a residential development names Esplanade Grande to the south which looks over the promenade. It is approximately 800m from Bognor Regis National Rail Station and the closest bus stop is less than 200m from the Site.
- 7.3 The proposed redevelopment comprises the change of use of the buildings to a Sui Generis House in Multiple Occupation (HMO) for team member accommodation connected to Butlins Bognor Regis. It is expected to accommodate 90 team members and an on-site manager. There will be two car parking spaces on site, including one disabled, and a minibus space for pick-up/drop-off use only. 20 cycle parking spaces will be provided on Site. Team members will have access to car and cycle parking on the Butlin's resort.
- 7.4 It is noted that due to the proximity of the Site and the low car ownership levels it is not expected that the residents will own cars or need to use them to get to the resort. However, all team members will have to sign an agreement communicating a 3 strike policy for contravening the agreement- which will include vehicles associated with team members parking on site or locally.
- 7.5 A pre-application letter from Arun District Council dated 14th October 2016 was supportive of the proposal as it was considered beneficial to the local economy by reason of freeing up space on the Butlins complex and enabling investment in new facilities; it is also thought to protect existing jobs and bring about future employment opportunities. West Sussex County Council (WSCC) also agreed that the site is in a sustainable location with Butlins only a short distance to the east of the Site.
- 7.6 The Local Planning Authority is Arun District Council and the Local Highway Authority is West Sussex County Council.
- 7.7 Based on a first principles analysis the majority of trips to work associated with the Site are expected to be undertaken on foot due to the close proximity to the Butlins resort, leading to a higher than average modal share of 96%. As a shuttle bus is in operation and the caretaker has access to a parking space on site it is assumed a 1% mode share for each mode respectively. Cycling is estimated at 2%.
- 7.8 In terms of personal, out of work trips, residents are expected to use varying modes of travel however, still mainly travel by foot. Rail travel is expected to have a higher utilisation due to ease of access to destinations such as Brighton, with bus travel used to connect residents to both the train station and locations such as Chichester. The Site will not generate significant vehicle trips as those residents with access to a vehicle will park it at the resort, it's expected that vehicle occupancy levels will be higher than vehicular at 20%.
- 7.9 In conclusion, the Site is located in a highly sustainable location, in good proximity to public transport, walking and cycling connections and nearby local amenities and is therefore suitable for development to provide team member accommodation. The proposals comply with the relevant planning policies in terms of car and cycle parking, with provision mainly provided on the existing Butlins resort, as agreed with Arun District Council.

Appendix A

PRE-APPLICATION RESPONSE

Arun District Council



Charles Rose
City Planning
2nd Floor West Wing
40-41 Pall Mall
London
SW1Y 5JG

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF
Planning General Enquiries
Tel: (01903) 737756 Fax: (01903) 730442
Dx: 57406 Littlehampton
Minicom: 01903 732765
e-mail: planning@arun.gov.uk
website: www.arun.gov.uk/planning

Your Ref:

Our Ref: PAA/157/16/

Please ask for: Mr S Davis

01903 737874

14 October 2016

Dear Mr Rose

Pre-Application Advice

Change of use of St Joseph's, Essex House and Blackbird Cottage to provide accommodation for up to 101 Butlins team members

St Joseph's, Albert House & Blackbird Cottage Bognor Regis

I write regarding the above matter and your enquiry received on 7th September 2016.

Description Of Proposed Development

You seek advice regarding a new use of the buildings known as St Josephs, Essex House (1-3 Walton Road) & Blackbird Cottage as a house in multiple occupation (HMO) for the accommodation of 101 Butlins team (staff) members. The proposed use also encompasses (1) a central courtyard area of land between Las Arenas and Blackbird Cottage; and (2) a standalone Conservatory located to the rear of Beach Lodge. No physical works are currently proposed.

Description Of Site

It is understood that your client's interest extends to most of the buildings within the square shaped 'block' formed by Albert Road to the west, Walton Road to the north, Walton Avenue to the east and the large flatted building (Esplanade Grande) to the south. These buildings include St Josephs, Essex House (1-3 Walton Road), Blackbird Cottage, Las Arenas, Beach Lodge, Walton Walls and Walton House. The exception is the property known as Pearlfishers which is in separate ownership. You refer to this block of land as the Complex.

However, the pre-application enquiry relates only to St Josephs, Essex House (1-3 Walton Road), Blackbird Cottage and the two pieces of land east of Las Arenas & Beach Lodge including the stand alone conservatory and kitchen (hereafter referred to as the application site).

The application site is predominantly flat, there are no trees to consider and boundary treatments comprise a mix of medium height walls (circa 1.5m), low fences (circa 1m) and hedges. The following is a summary of each of the parts of the site:

St Joseph's

St Joseph's is a three to four storey building which was formerly a care home with a total of 25

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bedrooms as well as other facilities including a chapel. It is physically connected to Essex House at ground floor level. It is white/cream rendered. There is a small parking area on the western side suitable for 4-5 cars. There are no sitting tenants.

Essex House

Essex House is a two storey terrace of 3 dwellings with additional accommodation in the roof. It is part flint and part light grey coloured brick. Part of the terrace has been extended at ground and first floor level to the rear. The building was previously converted to provide flats for the sisters and there are a total of 9 on the ground & first floors with additional living space within the roof. There is one sitting tenant within Essex House (at ground floor level in the north east corner of the building).

Blackbird Cottage

Blackbird Cottage is a two storey detached dwelling in red/brown brick (ground and part first floors) and white render (first floor). It comprises 13 bedrooms and was used as living accommodation by the sisters. There is also a smaller single storey stand alone building at the rear. There are no sitting tenants.

Beach Lodge Conservatory

There is a free standing conservatory in part brick and part uPVC to the rear of Beach Lodge. There is also a small free-standing kitchenette adjacent to this.

External Space

The gardens to the rear of the buildings are shared amongst all of the properties and provide for a central courtyard like space. There is also a freestanding bus shelter type smoking area adjacent to the boundary with Pearlfishers.

Description Of Locality

The complex is bound by roads on all sides, bar the south, where it is neighboured by a six storey block of flats, which adjoins the seafront. These flats overlook the site.

The Butlin's resort is approximately 300m to the east of the site and within a short walking distance. Bognor Regis Train Station is approximately 600m to the North West of the site.

Planning Issues

The following issues have been identified for consideration.

Principle;
Neighbour Amenity;
Amenity Space Provision;
Bin Storage;
Highways, Transport and Parking; and
Buildings or Structures of Character.

Relevant Planning History

BR/99/05/	Proposed single storey ground floor extension to provide freezer storage facility.	ApproveConditionally 09-05-2005
BR/72/05/	Proposed single storey ground floor extension to provide clerical office.	ApproveConditionally

decpar

EHEDM2	HER DM2 Locally Listed Buildings or Structures of Character
EDSP1	D SP1 Design
EECCSP2	ECC SP2 Energy and climate change mitigation
EENVDM2	ENV DM2 Pagham Harbour
EHSP4	H SP4 Houses in Multiple Occupation
EQEDM1	QE DM1 Noise Pollution
EQEDM2	QE DM2 Light Pollution
NEBR6	Bognor Regis Neighbourhood Plan 2015 Policy 6
ESDSP2	SD SP2 Built -Up Area Boundary
ETSP1	T SP1 Transport and Development

Planning policy guidance NPPF National Planning Policy Framework

Principle

PRINCIPLE:

The site is within an urban residential area where the principle of development is considered to be acceptable. The NPPF supports the effective and efficient use of land for sites in the built up area but also advises that new housing should be well integrated with and should complement neighbouring buildings and the local area in terms of scale, density, layout and access. The proposal is acceptable in principle given its location in a sustainable edge of town centre location within only a short walk from local shops, the beach and the Butlins complex.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF):

Paragraph 14 of the NPPF sets out a presumption in favour of sustainable development and states that where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless: (a) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or (b) specific policies in this Framework indicate development should be restricted. Paragraph 7 of the NPPF sets out three dimensions to sustainable development - economic, social and environmental.

Paragraph 49 of the NPPF states that: "Housing applications should be considered in the context of the presumption in favour of sustainable development". Furthermore, paragraph 50 states that:

"To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should: plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)"

The NPPF also states at paragraph 51 that:

"Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers."

DEVELOPMENT PLAN POLICIES RELEVANT TO THE USE:

There are no saved policies within the Adopted Local Plan which relate to houses in multiple occupation (HMO's). However, policy H SP4 of the emerging Local Plan (2011 - 2031) states that applications for HMO's will be favourably considered where they:

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- a. Do not adversely affect the character of the area;
- b. Do not contribute to the over concentration of HMOs in a particular area;
- c. Do not contribute to the generation of excessive parking demands or traffic in an area; and
- d. Provide adequate areas of open space.

Firstly, it should be noted that no physical alterations are proposed. Secondly, although the proposed use will intensify the use of the site, the previous and proposed uses are both residential in nature. Regard is also had to the particular circumstances of the applicant (Butlin's) and the mitigation measures that are proposed to combat the potential adverse effects that may arise (such as noise and light pollution).

Evidence from Environmental Health shows that there are 4 existing licensed HMO's in the immediate area. Three of these are on Albert Road and the fourth on Walton Road. It is not considered that the addition of the site as a HMO would result in an overconcentration of HMO's. Criteria (c) and (d) will be analysed elsewhere in this letter.

SUMMARY:

Given that there are no HMO policies within either the adopted Local or Neighbourhood Plans and that the emerging Local Plan can only be afforded very limited weight at this time, it is necessary to consider whether the proposal would benefit from the presumption in favour of sustainable development.

It is considered that the proposal will be beneficial to the local economy by reason of freeing up space on the Butlins complex and enabling investment in new facilities. This will also protect existing jobs and likely bring about further employment opportunities. The site is also sustainably located having regard to the presence of the Butlins site a short distance to the east (meaning that staff can easily walk between their place of residence & place of work). Economic growth at Butlins could also lead to higher social and environmental standards.

Neighbour Amenity

Paragraph 17 of the NPPF states that Development should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Paragraph 109 states that new development should be prevented from causing nearby land uses from being adversely affected by unacceptable levels of air or noise pollution.

In respect of the Adopted Local Plan, policy GEN7 (iv) indicates that development will be permitted if it takes into account the impact on adjoining occupiers, land, use or property. Policies GEN32-34 then seek to prevent new development from resulting in adverse impacts on neighbouring land uses in respect of noise, light and air pollution.

As with the previous application for Ashley House (BR/100/16/PL), we will require assurances that the intensification of these buildings will not result in harm to existing local residents living either within the complex or on roads surrounding (including the occupants of the Esplanade Grande). These properties could be adversely affected by noise either from within the site or from the movement of people between the site and Butlins.

Our main concern would be regarding the amenity of those sitting tenants within the complex who will share communal amenity space with the Butlins staff and who's windows are only a short distance from the buildings and walkways within the application site. These residents may be adversely affected by noise from residents within the buildings or when leaving/entering the site/buildings. They may also be affected by light pollution (such as security lights going on at unsociable hours).

I note your intention to provide mitigation measures in the same way as with Ashley House (i.e.

dec/paa

Management Plan, Acoustic Assessment & Travel Plan) and these measures are welcomed. I would also recommend that you provide information as regards the type of security lighting to be employed within the central shared area. Furthermore, during our site visit, we discussed the need for some strengthening of landscaping/boundary treatments within the central area to protect the existing residences (such as Las Arenas).

Finally, I note that the existing smoking shelter is located up against the boundary with Pearlfishers. This needs to be relocated away from this boundary and to a less noise sensitive location. Depending on where the shelter is sited, specific rules might need to be proposed to govern its use.

Overall, providing that noise and lighting are fully considered and sufficient mitigation measures proposed, then I consider that this scheme would be capable of support.

Amenity Space Provision

The NPPF indicates that good design should contribute positively to making places better for people. It also encourages the creation of places, streets and spaces which meet the needs of people are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character.

Policy GEN7 of the Arun District Local Plan further indicates that development will be permitted provided that amongst other considerations the proposal creates attractive places and spaces with the needs of people in mind. On this basis, well designed and adequate amenity space provision for residents is considered essential to meet the policy requirements of the local plan and Central Government Advice.

Policy D DM3 of the Arun Local Plan (2011 - 2031) Publication Version (October 2014) sets out external space standards for new residential dwellings and flats. This states that there must be 4m² of space for every 1 bedroom and 5 m² for every 2 bedroom flat.

It is not considered that the accommodation proposed meets the definition of a flat and that therefore, these standards should not be applied. The site/complex does include some areas of outdoor open space which may satisfy the need for amenity space. However, the use of these may also result in amenity impacts to the sitting tenants. It is noted that the site is within easy walking distance of Hotham Park, the beach and the Butlins site. Therefore, it is not considered necessary to provide external space within the site.

Bin Storage

For all new residential development including flat conversions, the applicant must show bin storage/collection provision as follows:-

Each unit should be provided with the equivalent of 240 litres of residual waste storage/bins. For flats, the communal/bulk bins can be used on the basis of 240 litres of residual waste storage/bin per flat. Alternatively one 240 litre wheelie bin for each property can be provided.

The same amount of storage space/bins for recyclable materials is required to be provided.

Where bin stores are adjacent to the access road serving the development or across a parking area there will need to be a road up to full highway standards and an indemnity provided for the Council's contractors to pass across servicing. The access of this type provided must be accessible/passable for collection schedules i.e. no parking or other obstruction.

The maximum pulling distances allowed under Health and Safety legislation are 10 metres 1100 litre bins and 50 meters for 240 litre bins.

decpsa

It is recommended that if any communal provision is located near or adjacent to the highway, it will be suitably enclosed and landscaped so that the maximum pulling distances and vehicle access requirements are complied with.

It should be noted that emerging Local Plan Policy D DM3 states that "External areas also need to include adequate space for recyclable and non-recyclable waste storage".

Please also have regard to the additional comments provided in January 2016 to your Transport Consultants regarding the Ashley House proposal.

Highways Transport And Parking

Planning policies allow for the safe movement of pedestrians and vehicles, giving priority to pedestrians, and car parking. Car parking requirements will vary according to the accessibility of the site to public transport or services, or location within a town centre. Paragraph 32 of the NPPF states that "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe".

I am not able to consult with West Sussex County Council (WSCC) on pre-application enquiries. You may contact them directly if you wish. Please see here:

http://www.westsussex.gov.uk/living/roads_and_transport/roads_and_footways/development_control_plans_and/information_for_developers/pre-application_advice_for_roa.aspx

WSCC parking standards for Houses in Multiple Occupation as contained within the 'Revised County Parking Standards and Transport Contributions Methodology' sets out a requirement for 0.5 spaces per room/unit. It is also noted that current vehicle ownership levels for Butlins staff members are very low at 0.09 vehicles per member and that there are only 45 vehicles for 470 staff members.

There are only around 4 car parking spaces within the site. However, the site is within only a short walk of the Butlins site and it would be acceptable to make provision within the Butlins site for the parking of these residents. However, please ensure that the staff parking provision on the Butlins site does not encroach on the staff parking provision already proposed for the Ashley House development.

Given the relatively short distance between the site & Butlins and the lack of space within the site for sufficient secure cycle storage to cover the needs of all residents, I would have no objection if sufficient cycle parking facilities were provided within the Butlins site instead. However, I think that you should provide some 'emergency' space for cycle parking to cover those times where a staff member cannot for some reason access the cycle parking on the Butlins site. I would also recommend that a minibus service is provided similar to that offered at Ashley House. This will provide staff with an alternative method of transport which could be particularly attractive to commuters in the dark, during bad weather or for any disabled staff.

Buildings Or Structures Of Character

The dwelling known as Walton Walls which lies in the north-eastern corner of the complex is locally listed. However, as no demolition or physical alterations are proposed, it is not considered that there would be any conflict with Local Plan policy GEN22.

Other Considerations

The Governments Technical Housing Standards (Nationally Described Space Standard) do not provide any relevant standards for Houses in Multiple Occupation. Instead, it is considered that regard should be had to Arun's Environmental Health Private Housing Standards. These reference the following two documents: LACORS Promoting Quality regulation (LGA) 2009 and

dec20aa

Chichester and Arun Landlord Accreditation Scheme Standards 2013. The Chichester and Arun Landlord Accreditation Scheme Standards 2013 provide several standards but none refer to situations where a bedroom includes a bathroom but shares other facilities.

Therefore, it is not possible to assess the amount of internal space under these standards and instead we would seek confirmation from the Council's HMO Officer. I would recommend that you liaise with our Environmental Health team prior to submitting your application.

Environmental Health Comments

The Council's Environmental Health Officers have made the following comments:

"I would like to make the following comments in regard to the above pre-app for change of use of St Joseph's, Essex House and Blackbird Cottage to provide accommodation for up to 101 Butlins team members.

* The three buildings are in a quiet residential area and there is the potential for noise or disturbance to residents of neighbouring properties and also the sitting tenants in some of the properties forming this application. This could be from the use of the site by Butlins staff, including the use of the outside areas as well as noise from staff leaving and returning to their accommodation in the early morning or late evening. However, I note that there are plans for an acoustic assessment and this will cover:

- o Impact on sitting tenants;
- o Staff noise; and
- o Mitigation measures.

I understand that a bespoke management plan will also be prepared and this will include the management of staff conduct and noise from the site.

* The applicants must provide with the full planning application a detailed acoustic assessment with mitigation measures forming part of this as well as detailed management plan for this site which will include controls to prevent noise disturbance from the proposed usage.

* In addition the accommodation is to meet with Arun's minimum standards for Houses in Multiple Occupation, the document is currently available on request but will shortly be accessible on the Council's website.

* A mandatory HMO license would be required for any property of 3 storey or more and occupied by 5 or more persons sharing of facilities."

Bin Storage

For all new residential development including flat conversions, the applicant must show bin storage/collection provision as follows:-

Each unit should be provided with the equivalent of 240 litres of residual waste storage/bins. For flats, the communal/bulk bins can be used on the basis of 240 litres of residual waste storage/bin per flat. Alternatively one 240 litre wheelie bin for each property can be provided.

The same amount of storage space/bins for recyclable materials is required to be provided.

Where bin stores are adjacent to the access road serving the development or across a parking area there will need to be a road up to full highway standards and an indemnity provided for the Council's contractors to pass across servicing. The access of this type provided must be accessible/passable for collection schedules i.e. no parking or other obstruction.

dec/pax

The maximum pulling distances allowed under Health and Safety legislation are 10 metres for 1100 litre bins and 50 metres for 240 litre bins.

It is recommended that if any communal provision is located near or adjacent to the highway, it will be suitably enclosed and landscaped so that the maximum pulling distances and vehicle access requirements are complied with.

It should be noted that emerging Local Plan Policy D DM3 states that "External areas also need to include adequate space for recyclable and non-recyclable waste storage".

Please also have regard to the additional comments provided in January 2016 to your Transport Consultants regarding the Ashley House proposal.

Conclusion

As set out earlier, paragraph 14 of the NPPF sets out a presumption in favour of sustainable development and states that where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless: (a) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or (b) specific policies in this Framework indicate development should be restricted.

It is not considered that there are any policies within the NPPF that would restrict this development proposal. Furthermore, it is considered that subject to sufficient measures being put in place to protect the amenity of other residents, the proposal can be considered to be sustainable development.

We accept that there is a need for Butlin's to find alternative accommodation for their staff and it is considered that in view of Butlin's being a responsible local employer with safeguards in place to minimise noise disturbance, that subject to the submission of an acoustic assessment, management plan, lighting assessment and travel plan statement, we could support this proposal. We may also condition any approval to be personal to Butlin's.

I also note that you also request advice re removing the restriction on the use of Blackbird Cottage and the legal agreements affecting Beach Lodge. The former would be removed by reason of a successful planning application in respect of the application site. In order to remove the latter, you would need to make a separate application to modify or discharge a planning obligation. Copies of the forms are not available on our website but we can post out a pack on request. Please note that we recently won an appeal concerning the removal of an age restriction on a flat within Bognor Regis. Therefore, you would need to put forward a strong justification in support of your application.

Follow Up Meeting

If you require a follow up meeting to discuss this pre-application and advice, you will need to contact me to arrange a convenient appointment.

Making an Application

If you decide to proceed with making an application you will need to quote the reference number for this advice in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

You will also need to submit the following documentation/information:

Fully completed and signed Application Form with full description of the proposal;

decpas

Ownership Certificate and Agricultural Land Declaration;
Correct Fee;
Location Plan (1:1250);
Site / Block Plan (1:500);
Elevations (Existing and Proposed);
Floor Plans (Existing and Proposed); and
Roof Plans.

Additionally the following documents will need to be provided:

Please note that the Council has a Local Validation Requirements List and you should refer to it before submitting your application. Failure to provide the required documentation and to complete the Validation Checklist and the Biodiversity Checklist will result in the application being treated as incomplete and delay the validation of the planning application.

I would suggest that the following additional documents will be required:

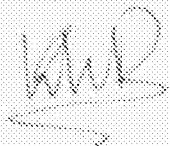
Management Plan;
Acoustic Assessment;
Lighting Assessment;
Environmental Health & Housing Statement;
Landscaping Scheme;
Bin Storage and Collection Provision;
Statement of Community Involvement; and
Travel Plan.

With regard to the pre-application community consultation, I would recommend that you notify all sitting tenants, occupiers of properties facing or overlooking the complex and potentially also those residents living on the likely walking route between the site and the Butlins site.

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case Officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the Case Officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request. Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely



Karl Roberts
Director Planning & Economic Regeneration

dec:pa

Appendix B

DEVELOPMENT FLOOR PLAN

- KEY
- Existing to be removed
 - Existing walls
 - Proposed walls
 - Site boundary
 - The complex boundary (extent of ownership)
 - Access
 - Restricted Access

1 ST. JOSEPHS		
ROOM NUMBER	ROOM TYPE	AREA
0.01	Twin	16.4m ²
0.02	Twin	15 m ²
0.03	Twin	16.5m ²
0.04	Twin	15.4m ²
0.05	Kitchen	25.4m ²
0.06	Living	25.4m ²
0.07	Twin	19.3m ²
0.08	Single	9.7m ²
0.09	Twin	16.3m ²
0.10	Kitchen	17.2m ²
0.11	Twin	15.8m ²
0.12	Twin	14.4m ²
0.13	Twin	17.5m ²
0.14	Twin	14.3m ²
0.15	Twin	14.7m ²
0.16	Single	10.5m ²
0.17	Twin	12.3m ²
0.18	Kitchen	7.6m ²
0.19	Kitchen	16.4m ²
0.20	Twin	18.7m ²
2. ESSEX HOUSE		
ROOM NUMBER	ROOM TYPE	AREA
0.21	Twin	13.2m ²
0.22	Lounge	10.3m ²
0.23	Kitchen	15.4m ²
0.24	Twin	12.3m ²
0.25	Twin	13.3m ²
0.26	Single	10.4m ²
0.27	Store	6.03m ²
0.28	Twin	13.2m ²
3 BLACKBIRD COTTAGE		
ROOM NUMBER	ROOM TYPE	AREA
0.29	Double	10.6m ²
0.30	Kitchen	8.9m ²
0.31	Twin	17.7m ²
0.32	Manager's flat	14.2m ²
0.33	Twin	13.3m ²
0.34	Kitchen	11.1m ²
0.35	Twin	11.5m ²
0.36	Twin	13.8m ²
0.37	Single	10.2m ²

GROSS INTERNAL AREAS	
ST. JOSEPHS	550m ²
ESSEX HOUSE	160m ²
BLACKBIRD COTT	186m ²

NOTES

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All drawings to be read in conjunction with all contract documents and all structural steelwork drawings to be submitted to engineer for approval

RIBA
Chartered Practice

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1:200	0m 4m 8m 12m	
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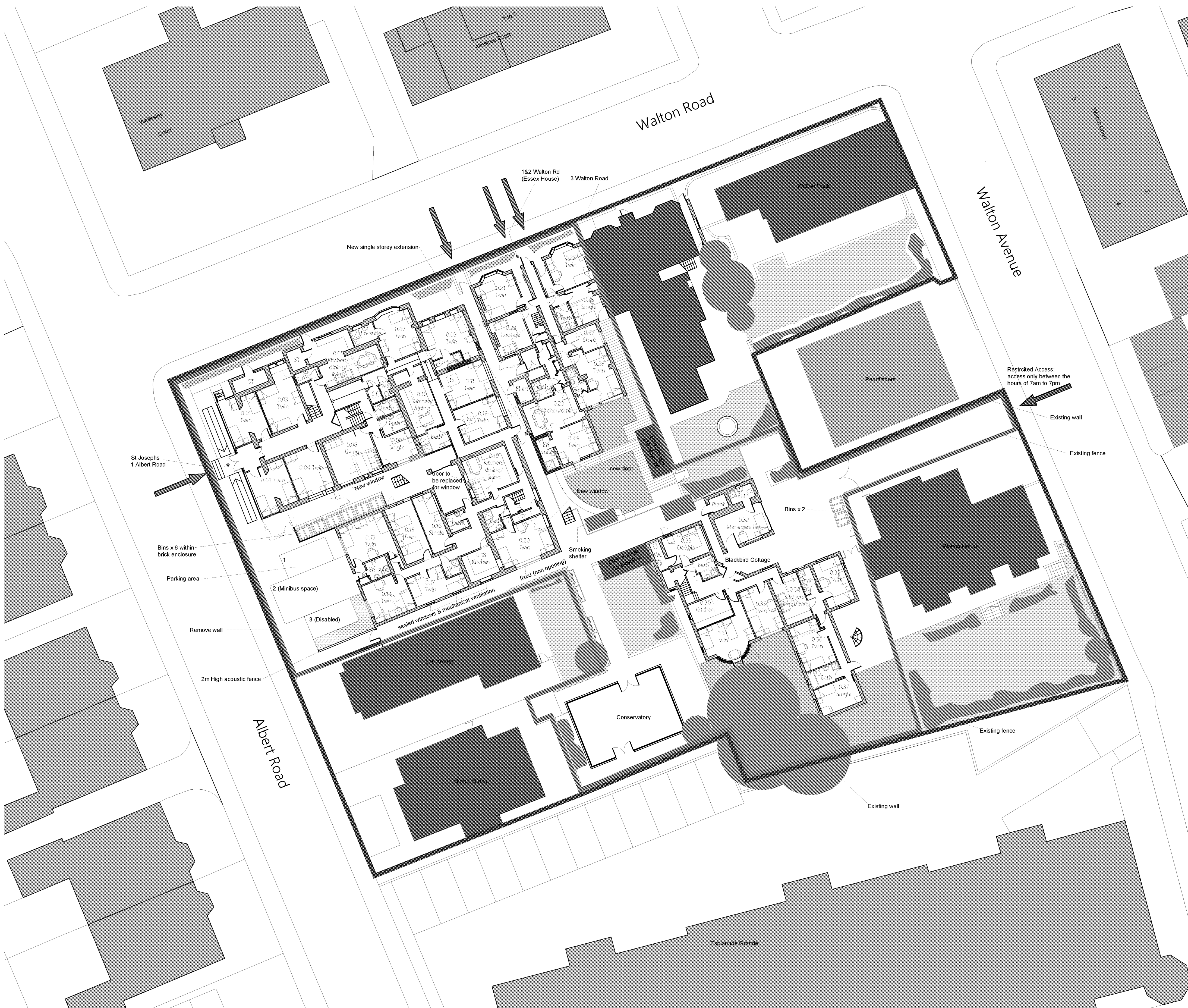
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Rev 07 General Amendments	03.12.16	PC	NH
Rev 06 General Amendments	25.11.16	PC	NH
Rev 05 General Amendments	17.11.16	PC	NH
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Rev 03 General Amendments	07.09.16	MW	NH
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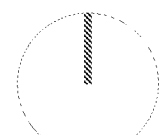
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CLIENT	Butlins Skyline Ltd
PROJECT	St Josephs
DATE	December 2016
DRAWING TITLE	Proposed Ground Floor Plan

DRAWING NO.	REVISION
129 / 2.030	10



Proposed Ground Floor Plan
Scale 1:200



KEY

---	Existing to be removed
---	Existing walls
---	Proposed walls
---	Site boundary
---	The complex boundary (extent of ownership)
→	Access

1 ST. JOSEPHS		
ROOM NUMBER	ROOM TYPE	AREA
101	Single	9.6m ²
102	Single	10.3m ²
103	Kitchen/ Dining	12.4m ²
104	Kitchen/ Dining	13.8m ²
105	Single	9.5m ²
106	Single	8.6m ²
107	Double	12.2m ²
108	Twin	14.8m ²
10	Twin	16.5m ²
110	Twin	23.5m ²
111	Twin	21.5m ²
2. ESSEX HOUSE		
112	Twin	17.0m ²
113	Twin	10.2m ²
114	Kitchen	8.6m ²
115	Living	7.4m ²
116	Twin	12.6m ²
117	Kitchen	6.4m ²
118	Twin	10.6m ²
3 BLACKBIRD COTTAGE		
11	Twin	8.4m ²
120	Single	9.4m ²
121	Twin	11.4m ²
122	Kitchen/ Dining/ Living	18.7m ²
123	Twin	13.7m ²
124	Twin	14.6m ²
125	Living	8.1m ²

GROSS INTERNAL AREAS	
ST. JOSEPHS	272m ²
ESSEX HOUSE	118m ²
BLACKBIRD COTT	138m ²

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SCALE

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40mm	4m	8m	16m	20m
60mm	6m	12m	24m	30m

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Rev 05 General Amendments	23.11.16	PC	FH
Rev 04 General Amendments	07.11.16	PC	NH
Rev 03 3 Walton Road renewed	26.09.16	FH	NH
Rev 02 General Amendments	07.09.16	MTW	FH
revision	date	author	check

CLIENT	Butlins Skyline Ltd
PROJECT	St Josephs
DATE	September 2016
DRAWING TITLE	Proposed First Floor Plan

DRAWING NO.	129 / 2.031	REVISION	09
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1. ST. JOSEPHS		
ROOM NUMBER	ROOM TYPE	AREA
2.01	Single	9.5m ²
2.02	Twin	14.1m ²
2.03	Kitchen/ Dining/ Living	14.5m ²
2.04	Twin	11.6m ²
2. ESSEX HOUSE		
2.05	Single	11.8m ²
2.06	Single	12.4m ²
2.07	Kitchen/ Dining	19.3m ²

GROSS INTERNAL AREAS	
ST. JOSEPH'S	80m ²
ESSEX HOUSE	120m ²

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Rev 06 General Amendments	02 12 16	PC	NH
Rev 04 General Amendments	28 11 16	RC	NH
Rev 03 General Amendments	17 11 16	RC	NH
Rev 02 General Amendments	07 09 16	MY	IA
revision	date	author	check

CLIENT	Butlins Skyline Ltd
PROJECT	St Josephs
DATE	December 2016
DRAWING TITLE	Proposed Second Floor Plan

DRAWING NO.	REVISION
129 / 2.032	08

Proposed Second Floor Plan

- KEY
- Existing to be removed
 - Existing walls
 - Proposed walls
 - Site boundary
 - The complex boundary (extent of ownership)
 - Access

1 ST. JOSEPH'S		
ROOM NUMBER	ROOM TYPE	AREA
3.01	Single	7.6m ²
3.02	Living	6m ²
3.03	Single	6.8m ²
3.04	Single	7.5m ²
3.05	Kitchen/ Dining	6.7m ²
3.06	Single	6.8m ²

GROSS INTERNAL AREAS	
ST. JOSEPH'S	74m ²

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All drawings to be read in conjunction with all contract documents and all structural steelwork drawings to be submitted to engineer for approval

RIBA
Chartered Practice

SCALE				@ A1
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Rev 07 General Amendments	14.12.16	CW	NH
Rev 08 General Amendments	07.12.16	EC	NH
Rev 04 General Amendments	02.12.16	EC	NH
Rev 04 General Amendments	28.11.16	EC	NH
Rev 03 General Amendments	17.11.16	EC	NH
Rev 02 General Amendments	07.09.16	NW	NH
revision	date	author	check

CLIENT	Butlins Skyline Ltd
PROJECT	St Josephs
DATE	September 2016
DRAWING TITLE	Proposed Third Floor Plan

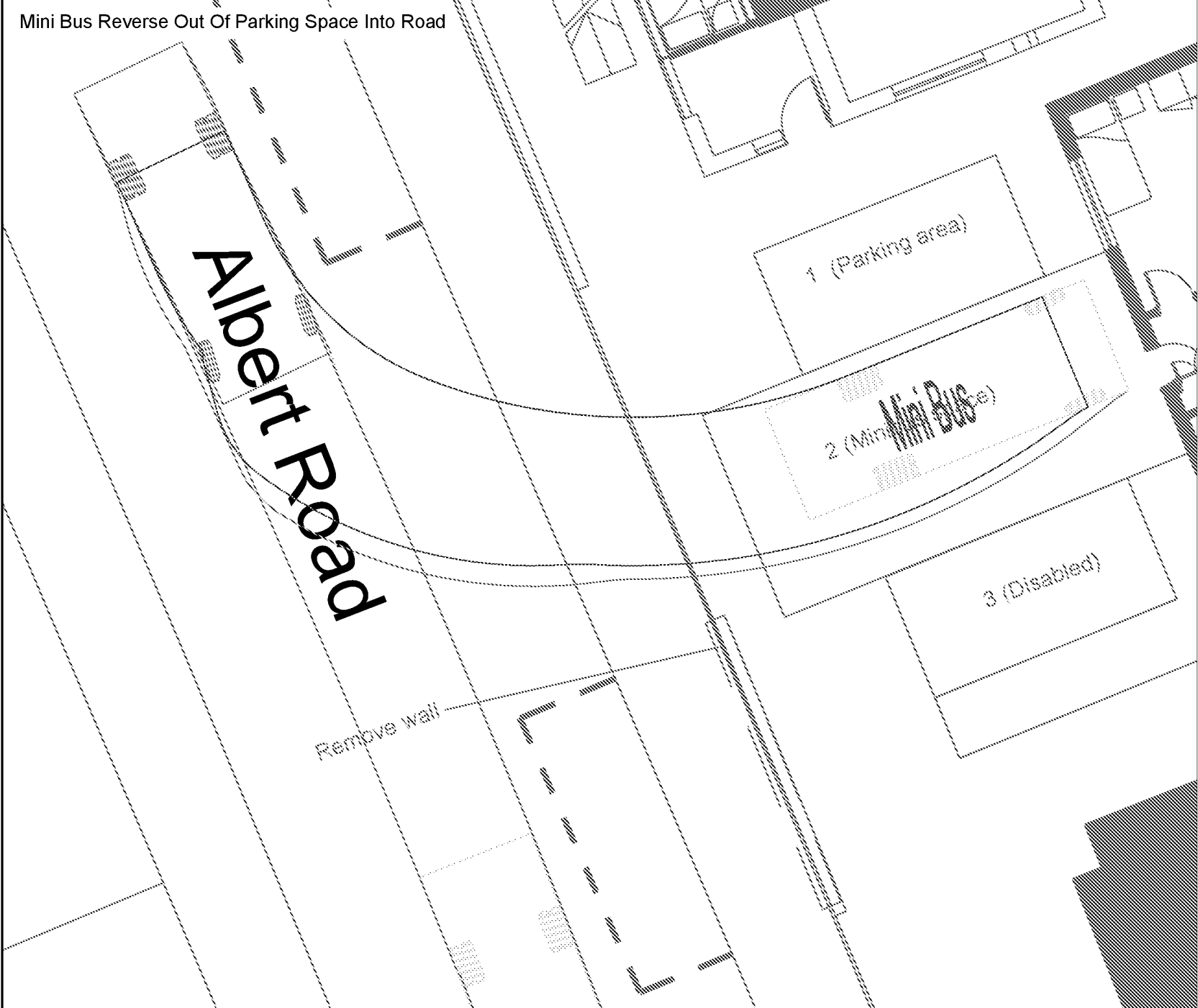
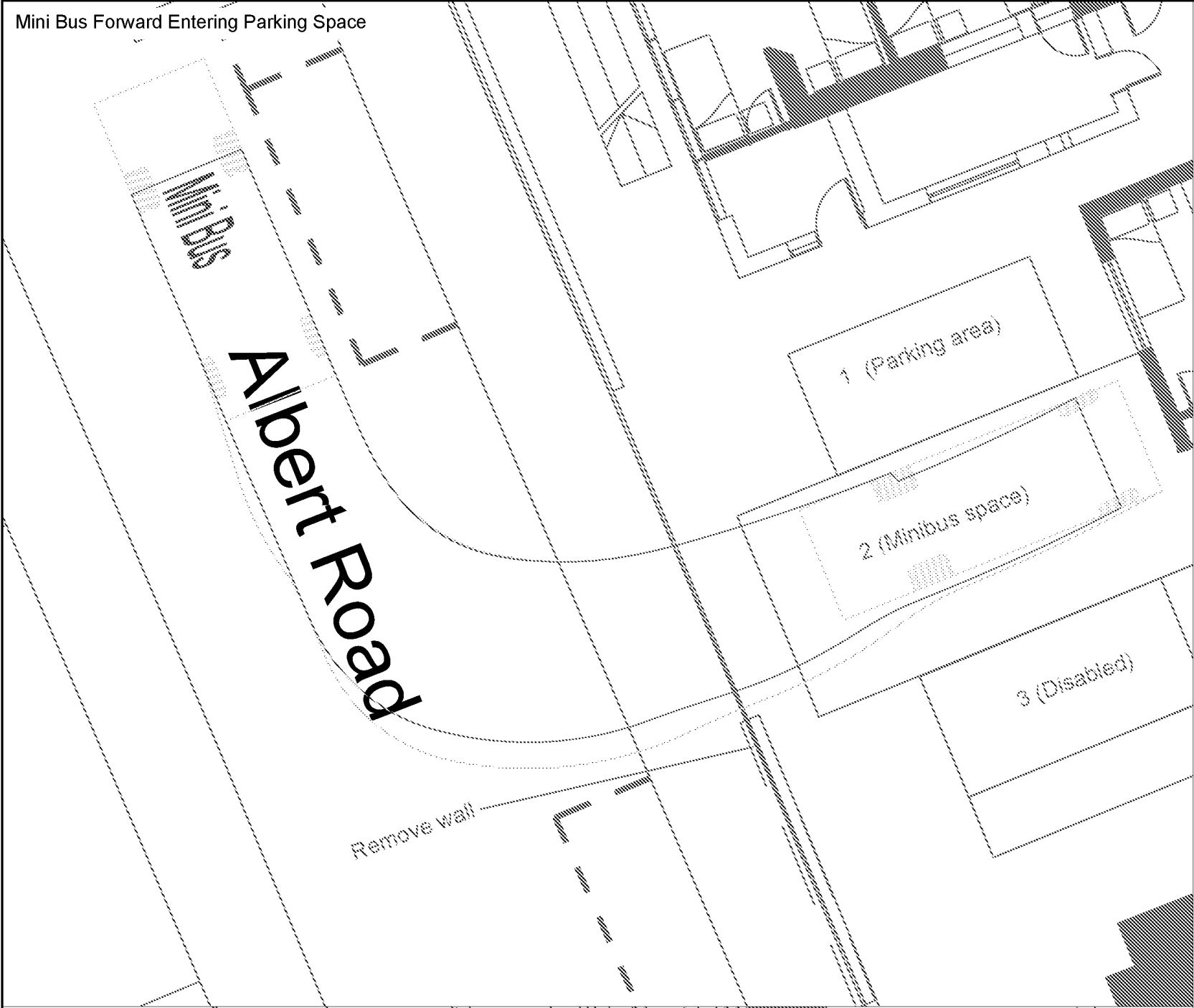
DRAWING NO.	REVISION
129 / 2.033	08



Proposed Third Floor Plan
Scale 1:200

Appendix C

MINI-BUS SWEPT PATH



Notes

1) Vehicle forward speed $\square 5\text{km/h}$
2) Vehicle reverse speed $\square 2.5\text{km/h}$
3) No dry steering was used

Mini Bus	6.330m
Overall Length	2.12m
Overall Width	2.801m
Overall Body Height	0.374m
Min Body Ground Clearance	2.12m
Track Width	4.00s
Lock to Lock Time	6.450m
Kerb to Kerb Turning Radius	

Rev	Date	Revision details	Drawn	Checked	Approved
Drawn	DH	Checked	HMJ	Approved	JS
Original drg	A3	Date of Issue	2011	Scale	1:100
Drawing Status	Preliminary	Drawing Number	ST1746	Rev	01

27-32 Old Jewry London EC2R 8DQ T 020 3714 4400 E london@jmp.co.uk W www.jmp.co.uk	Client City Planning	Project St Joseph's Bognor Regis	Title Mini Van Swept Path Analysis
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