



**WHALEBACK**

DESIGN, ACCESS AND PLANNING STATEMENT

# Milton Lodge, 192 Hawthorn Road

ADDRESS

Milton Lodge  
192 Hawthorn Road  
Bognor Regis  
PO21 2UZ

DATE

February 2025

REVISION

1

WHALEBACK LTD

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## Introduction

Whaleback is instructed to prepare and submit a full planning application at Milton Lodge, Hawthorn Road, Bognor Regis for a change of use from supported living accommodation to ten residential units (Use Class C3), proposed rear extension following demolition of detached building, fenestration changes and associated works.

This statement introduces the site and surroundings, the development proposal, the relevant planning history and the planning policy framework. A planning appraisal then considers the merits of the scheme, followed by a conclusion.

This statement is submitted in support of the application and should be read in conjunction with:

- Architectural Drawings (M.J. Humphrey Limited- February 2025)
- Flood Risk and Drainage Assessment (Motion - March 2025)
- Highways Technical Note (Motion - February 2025)
- Sustainability Energy Note (Greengauge - March 2025)
- Vacancy Letter (Clarion - February 2025)

## Site and Surroundings

Milton Lodge is located to the north side of Hawthorn Road as it begins to wind towards the B2166 to the south-west. The site is roughly triangular in shape and consists of three separate buildings; a two-storey main building that fronts onto Hawthorn Road and two single storey buildings positioned to the rear.

The main building features a brickwork exterior and a clay-tiled gable roof, with projecting gabled bay windows at first floor. White uPVC windows are positioned across the building. The property has been subject to modern extensions in the past, primarily to its western side where a two-storey, flat roof extension wraps around its north-western corner. A single storey, flat roof extension adjoins to the eastern flank wall of the building, set slightly back from the principal façade.

The remaining structures are single storey in height, comprising a building along the north-eastern site boundary and another to the northern site corner. The north-eastern building is sited close to the main property, set at an angle as it follows the site boundary, and features a long hipped roof clad in clay tiles.

The northern building, perpendicular to the north-eastern structure, has a shallow gable roof and runs parallel to the north-western site boundary along its length.

The site was previously operated by Clarion Housing, who worked with West Sussex County Council and the Aldingbourne Trust to provide accommodation for individuals with learning disabilities or autism. The main building comprised 10 bedrooms in total, including ground floor staff accommodation to provide support for residents and accommodation within the roof space. The north-eastern building provided bed space for



Application Site

## Site and Surroundings

a further two residents, while the northern building served primarily as a communal crafts space.

The site has been vacant since July 2024 and the buildings are starting to show internal signs of disrepair/damp.

The site has large areas of landscaped amenity areas and a communal parking area for 5 vehicles. Neighbouring properties include Squirrel Corner beyond the western site boundary and Honeysuckle Lodge to the north-western site boundary. 190 Hawthorn Road is to the north-eastern site boundary and is in use as a residential care home.



Milton Lodge as viewed from Hawthorn Road

## Site Photographs



Milton Lodge - Front/Southern Elevation



Milton Lodge at ground floor, showing signs of disrepair



Northern 'communal' building adjacent to north-eastern accommodation



Landscaped communal gardens

# Proposed Development

The proposed development is for the change of use of Milton Lodge from supported living accommodation into ten, self-contained residential units and associated operational development.

The applicants will continue to use the Aldingbourne Trust to house those in need of accommodation, but are seeking to change the use of the site so that it functions as ten separate residential units to suit Aldingbourne's need of single occupancy self-contained accommodation.

The operational development includes construction of a single-storey rear extension to the main property following the demolition of the north-eastern detached building. Fenestration changes are also proposed to facilitate the conversion of the retained structures.

The proposed extension will feature brickwork matching the main property, while fenestration will be formed of white uPVC.



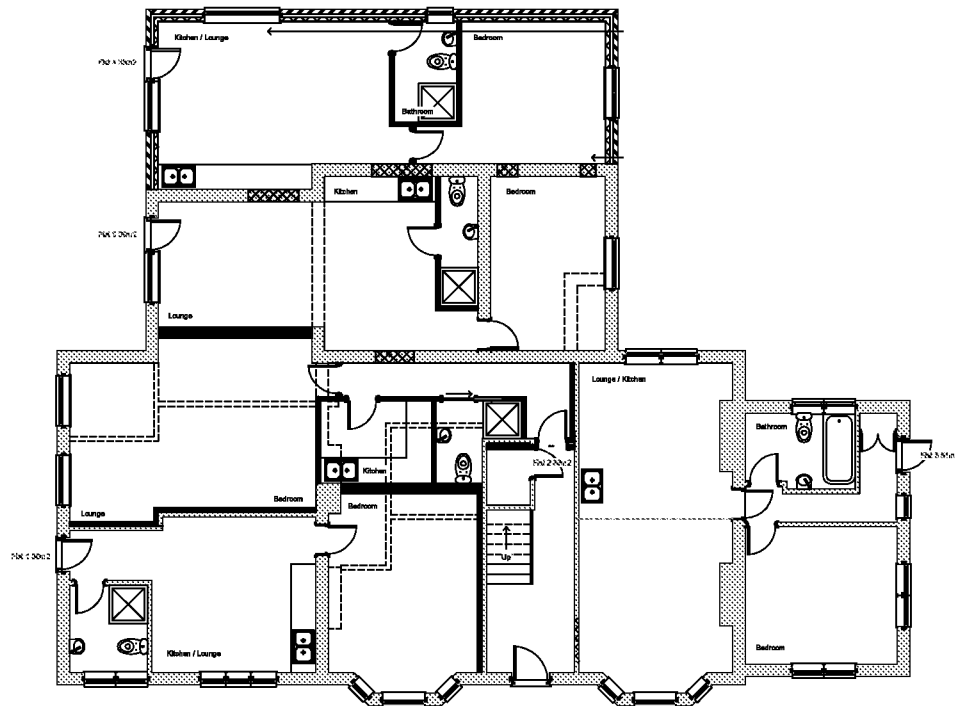
Proposed elevations, including single storey rear extension

# Proposed Development

The proposed accommodation schedule comprises:

- **Flat 1** (Ground Floor): One-bed, one-person unit
- **Flat 2** (Ground Floor): One-bed, one-person unit
- **Flat 3** (Ground Floor): One-bed, one-person unit
- **Flat 4** (Ground Floor): One-bed, one-person unit
- **Flat 5** (Ground Floor): One-bed, two-person unit
- **Flat 6** (First Floor): One-bed, two-person unit
- **Flat 7** (First Floor): One-bed, one-person unit
- **Flat 8** (First Floor): One-bed, one-person unit
- **Flat 9** (Second Floor): One-bed, one-person unit
- **Flat 10** (Northern Building): One-bed, two-person unit

There are no changes proposed to the existing parking arrangements or landscaping, aside from an area of proposed lawn in placed of the demolished north-eastern building. The communal amenity space will be retained for enjoyment by future residents.



Proposed ground floor arrangement

## Relevant Planning History

The below planning history is relevant to the application site:

- **BR/175/04:** Single storey extension to provide disabled WC, entrance lobby and cloaks area. Approved 25th June 2004.
- **BR/348/02:** Alterations and refurbishment works of warden assisted accommodation. Approved 4th March 2003.
- **BR/148/01:** Studio flat for wheelchair disabled sheltered accommodation. Approved 11th July 2001.
- **BR/271/96:** Continuance of use without compliance with Condition 2 imposed under BR/917/84 for use of games room as a craft service facility. Approved 10th January 1997.
- **BR/94/93:** Conversion of existing detached garage into self-contained residential unit for one person, for ancillary use with main building. Approved 19th November 1993.
- **BR/232/89:** Conversion of garages to living accommodation to extend hostel use Refused 4th September 1989.
- **BR/175/88:** Fire precaution works to a Residential Care Home. Approved 11th April 1988.

As the above planning applications all pre-date November 2005, the approved plans and other application documentation are not available to view online. However, it appears that permissions BR/94/93 and BR/148/01 relate to the creation of additional accommodation within the single storey building to the north-eastern site boundary.

The site planning history also corroborates the premises' classification as supported living accommodation, with the permission descriptions for BR/175/88, BR/148/01 and BR/348/02 referring to Milton Lodge as a "residential care home", "wheelchair disabled sheltered accommodation" and "warden assisted accommodation".

# Planning Policy Framework

Planning and Compulsory Purchase Act 2004 Section 38(6) requires local planning authorities to determine planning applications in accordance with the development plan, unless other material considerations indicate otherwise.

## NATIONAL PLANNING POLICY FRAMEWORK (2024)

A presumption in favour of sustainable development is found at the heart of the NPPF, for both plan-making and decision-taking, defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): economic, social and environment.

Sub-paragraph 11(d) directs decision-makers to apply a presumption in favour of sustainable development if the most important policies for determining the application are found to be out-of-date because the LPA cannot demonstrate a four-year supply of deliverable housing sites. In these circumstances, applications involving the provision of housing should be granted permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or the proposal would cause harmful impacts on protected area. Particular regard should be given to directing development to sustainable locations and making effective use of land, amongst other material considerations.

## ARUN LOCAL PLAN (2018)

The planning policies of the Arun Local Plan (ALP) relevant to the assessment of this proposal are:

- **Policy SD SP1** – Sustainable Development
- **Policy SD SP1a** – Strategic Approach
- **Policy SD SP2** – Built-up Area Boundary
- **Policy H SP1** – The Housing Requirement
- **Policy D SP1** – Design
- **Policy D DM1** – Aspects of Form and Design Quality
- **Policy D DM2** – Internal Space Standards
- **Policy D DM4** – Extensions and Alterations to Existing Buildings
- **Policy ECC SP2** – Energy and Climate Change Mitigation
- **Policy T SP1** – Transport and Development
- **Policy ENV DM2** – Pagham Harbour
- **Policy W DM2** – Flood Risk
- **Policy W DM3** – Sustainable Urban Drainage Systems
- **Policy WM DM1** – Waste Management

# Planning Policy Framework

— **Policy QE SP1** – Quality of the Environment

## EMERGING ARUN LOCAL PLAN 2023-2041

The Regulation 18 Consultation for the emerging Arun Local Plan has recently closed. The purpose of the consultation was to understand local planning issues and options for future development across Arun District. The consultation did not identify any potential development sites or draft planning policies and so has little weight in the decision-making process.

## BOGNOR REGIS NEIGHBOURHOOD PLAN (2015)

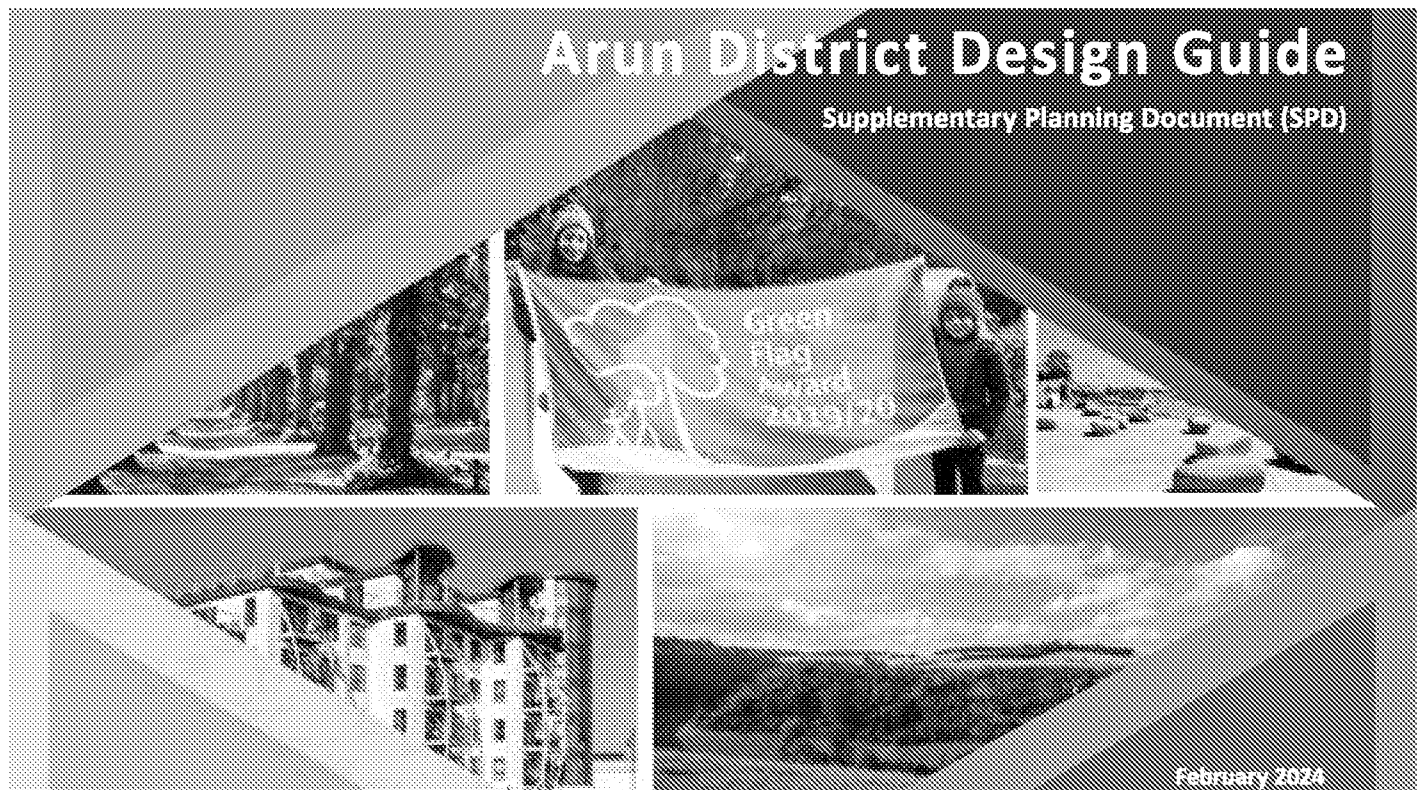
The Bognor Regis Neighbourhood Plan (BRNP) policies relevant to assessment of the planning application are:

— **Policy 8a** - Design Excellence

## SUPPLEMENTARY PLANNING POLICY DOCUMENTS AND GUIDANCE

The following planning guidance documents are relevant to this planning application:

- Design Guide SPD (2024)
- Arun Parking Standards SPD (2020)



Arun Design Guide (2024)

# Planning Appraisal

## PRINCIPLE OF DEVELOPMENT

ALP Policy SD SP2 states that development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies within the Plan.

The site lies within the Bognor Regis Built-Up Area Boundary as defined by the Local Plan Policies Map. The principle of residential development is therefore accepted, subject to assessment against other policies within the development plan and other material planning considerations.

There are no planning policies within the Arun Local Plan or Bognor Regis Neighbourhood Plan that specifically protect supported living premises from conversion. However, this application is supported by a letter from the previous operators (Clarion) outlining the redundancy of the existing use. The letter states that the property has been vacant since June 2024 due to insufficient demand for its current lawful use and that the cost of refurbishment for an alternative purpose was deemed financially unviable. The vacant building will be brought back into active use, rather than deteriorating further due to damp and disrepair.

The NPPF is a material planning consideration that must be taken account of when assessing planning applications. NPPF paragraph 11(d) directs decision-makers to apply a presumption in favour of sustainable development if the most important policies for determining the application are found to be out-of-date. In these circumstances, applications involving the provision of housing should be granted permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

The current NPPF sets out circumstances where local plan policies relating to housing are rendered out-of-date and the presumption in favour of sustainable development is engaged. NPPF paragraph 79(c) states that where housing delivery has fallen below 75% of the housing requirement over the previous three years, the presumption in favour applies. NPPF paragraph 80 goes on to state that the most recently published Housing Delivery Test must be used when calculating LPA housing performance and the consequences set out in NPPF paragraph 79.

The most recent Housing Delivery Test (MHCLG – published December 2024) assessed housing delivery performance for all plan-making authorities for the previous three financial years (2020/21, 2021/22 and 2022/23). Arun District Council delivered 70% of their required housing need from April 2020 to April 2023, below the 75% threshold of NPPF paragraph 79(c). The presumption in favour of sustainable development therefore applies across Arun District and the tilted balance in favour of approving applications must be engaged when assessing housing proposals.

Furthermore, a revised NPPF was published in December 2024, setting out a requirement for LPAs to demonstrate a five-year land supply of housing based on a new standard method for calculating housing need.

The most recent Annual Monitoring Report (January 2025) for the District concludes that the Council can only demonstrate a housing land supply figure of 3.41 years, based on the new standard method. This demonstrates that the LPA have both a housing supply shortfall and poor past delivery record.

The magnitude of the housing shortfall and historic under delivery within Arun District

## Planning Appraisal

is also a material consideration that *weighs significantly in favour* of the proposed housing development. This is particularly pertinent presently, where the Labour Government has set a clear objective for local authorities to significantly boost the supply of homes across this parliament.

NPPF paragraph 73 sets out how even small and medium sized sites can make an important contribution to meeting housing requirement of an area, pointing to how they are often built-out relatively quickly. The application site (being less than 1 hectare in size) is exactly the type of small/medium sized site that is attributed importance in boosting housing. The proposed ten homes are deliverable within the first five years and would positively contribute to the LPA's housing supply and delivery shortfall.

NPPF paragraph 125c) also asserts that substantial weight must be given to the use of brownfield land within settlements for homes, providing no substantial harm would be caused by the proposal. NPPF paragraph 125d) goes onto to state that the development of under-utilised buildings to help meet housing needs, especially where land supply is constrained and sites could be used more effectively.

The proposed residential conversion will make efficient and effective use of a vacant building, delivering ten homes at a time when Arun District's housing land supply is significantly constrained. As directed by the NPPF, the proposal must therefore be given *substantial weight* in support of approval, with there being no substantial harm associated with the scheme as set out below.

Overall, the scheme for ten dwellings is acceptable in principle, being within the confines of the Bognor Regis settlement boundary. There are no planning policies that seek to protect the existing use, while the tilted balance in favour of the housing development applies to the proposal. The re-use of vacant, brownfield land in a more efficient manner must also be given significant weight. As such, the planning balance weighs heavily towards approval, subject to an assessment of other material planning considerations as set out below.

### DESIGN AND VISUAL IMPACT

Local Plan Policy D SP1 and D DM1 states that development should make efficient use of land and reflect the character of the application site and the surrounding area in terms of its layout, density, scale, massing, building materials and landscaping, amongst other considerations.

The majority of the proposed residential units will be created through the conversion of the main building and the detached structure in the northern corner of the site, making efficient use of existing buildings.

The main building fronts onto Hawthorn Road and the scheme would result in a minor visual impact on the local street scene, limited to fenestration changes necessary for the residential conversion. The proposed fenestration will be well-positioned and constructed from white uPVC to match the existing windows at Milton Lodge.

The proposed rear extension would be largely screened from view, save for glimpsed views from Hawthorn Road. The north-eastern building would be demolished to make way for the extension, resulting in an overall reduction in built form within the site, while the extension would be subservient to the main building due to its single storey nature. The site has ample space to accommodate the extension and would be of an appropriate design,

# Planning Appraisal

using facing brickwork for the exterior to match the host property.

The northern building would be subject to minimal fenestration changes, utilising white uPVC to match the main building. No changes are proposed to the existing soft landscaping, ensuring the site's verdant character and its positive contribution to the street scene is maintained.

Overall, the development proposes external building works which are sympathetic to the design of the main building and has minimal visual impact on the wider street scene, in accordance with ALP policies D SP1, D DM1 and D DM4, BRNP Policy 8a and the recommendations within the Arun Design Guide SPD.

## NEIGHBOURING AMENITY

The western flank wall of Milton Lodge is c.22.5m from the side windows of Squirrel Corner to the west, a substantial distance that prevents any harmful overlooking from future occupiers of the proposed scheme.

There is c.16m between the boundary of Honeysuckle Lodge to the north-west and the first-floor and second-floor bedroom / living room windows serving Flat 6 and Flat 9. Given that Milton Lodge is positioned at an angle to Honeysuckle Lodge, any upper floor views towards the neighbouring garden space would be oblique. This, combined with the substantial separation distance, will ensure that no harmful overlooking would occur to occupiers at Honeysuckle Lodge.

The main building at Milton Lodge is situated approximately 10.5 metres from the shared boundary with 190 Hawthorn Road to the northeast. Milton Lodge follows the curve of Hawthorn Road, positioning the application property at an angle to 190 Hawthorn Road. As such, views from the first- and second-floor windows are directed away from the neighbouring building, instead facing either the less usable front amenity space or the densely vegetated communal outdoor area at the rear. While the impact on neighbouring amenity is tempered by No. 190 operation as a residential care home, rather than a typical private dwelling, the proposed scheme would nonetheless result in no significant loss of privacy for neighbouring users.

Views from the new dwelling within the northern building would be directed towards the communal amenity space on-site, ensuring no loss of privacy to surrounding properties.

The proposed extension is single storey in height, adequately set back from neighbouring properties and replacing the northern-eastern detached building, which is higher and closer to the boundary than the proposed extension. The proposed extension would therefore improve neighbouring levels of light and outlook as a result.

There would be a maximum of 13 people coming and going from the site, comparable to the existing lawful use, which can accommodate a maximum of 11 people. As such, the level of activity would remain similar to the existing use, ensuring no significant increase in noise or disturbance to surrounding neighbours.

Overall, the proposed scheme would result in no significant impacts to neighbouring amenity due to the single storey nature of the proposed extension, suitable distances between the windows in the main building and the site boundaries, and an appropriate level of comings and goings.

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## STANDARD OF ACCOMMODATION

ALP Policy D DM2 states that the LPA will require internal spaces to be of an appropriate size, with the National Described Space Standards (NDSS) providing guidance.

The NDSS recommends a minimum floor area of 37sqm for one-bed, one-person units, a standard that all proposed one-person flats would exceed. The remaining one-bed, two-person units (Flats 5, 6, and 10) would each have a minimum floor area of 51sqm, which would exceed NDSS requirement of 50sqm for these types of units.

Each habitable room would have access to good levels of light and outlook and no mutual overlooking would occur between flats due to the orientation of existing and proposed windows.

Future occupiers would have access to the extensive communal grounds on site, in addition to the public green space and recreational grounds only 15m due south of the application site. There would be no access to private outside space, as is often the case for flatted development, which is nonetheless balanced against the provision of communal amenity space, convenient access to public green space and the tilted balance in favour of ten deliverable homes.

Overall, the proposal would result in a good standard of living for future occupiers, in accordance with general objectives of the NPPF and Policies D DM2 and QE SP1 of the ALP.

## HIGHWAYS SAFETY AND PARKING

The application is accompanied by a Highways Technical Note (Motion - February 2025), which should be referred to for further detail.

The document concludes that the predicted increase in vehicular movements would be minimal and that there would be no detrimental impact on the local highway network. The existing on-site parking area will be used for the parking of five vehicles, with any overspill parking comfortably accommodated within the local road network - which has a total roadside car parking occupancy of 44%. Secure cycle parking can be accommodated within the site and secured by planning condition if necessary.

The proposal would therefore lead to a minimal impact on highways safety and on street parking capacity, in accordance with ALP Policy T SP1.

## AIR QUALITY ASSESSMENT

The Highways Technical Note (Motion - February 2025) outlines at paragraph 4.8 that there would be 21 total vehicular movements associated with the proposed development, in comparison to 20 total vehicular movements for the existing supported living use.

An increase of only one additional vehicular movement would lead to a minimal impact on air pollution and, as such, the established air quality within the local area would be largely unaffected by the proposed development.

## ENVIRONMENTAL SUSTAINABILITY

A Sustainable Energy Note (Greengauge - March 2025) accompanies this application and should be referred to for further detail.

## Planning Appraisal

The report concludes that the proposal will be able to generate 10% of its energy consumption through renewable sources, achieved through the installation of solar panels and subject to an appropriate visual impact on the street scene. Details of the proposed solar panels can be secured by planning condition if required.

The report also demonstrates that the proposed dwellings will meet a water efficiency target of 110l/p/d.

### FLOOD RISK AND DRAINAGE

A Flood Risk Assessment and Drainage Strategy (Motion - March 2025) supports this application and should be referred to for further detail.

The report concludes that the site is not at risk of fluvial or tidal flooding and is at 'very low' risk of surface water flooding, now and in the future. The site is within an area with potential for groundwater flooding and therefore, in combination with assessments at recent developments near to 192 Hawthorn Road, infiltration would not be a viable form of surface water discharge for the proposed development.

Water butts positioned under existing downpipes and a rainwater garden (located in the existing communal amenity space) will be utilised as an effective SuDS strategy

The site currently drains some of its roof and surface water to the foul drainage system. The proposed development and its drainage strategy will remove some of these misconnections and will redirect surface water to the public surface water sewerage system. Therefore, the proposed drainage strategy will not only reduce surface water outflow from the areas that are to be developed when compared to the existing, but it will also alleviate the existing load on the public foul sewer system.

Overall, the site is not an unacceptable risk of flooding and the drainage strategy has been designed so that the development can manage its foul and surface water sustainably.

### BIODIVERSITY ENHANCEMENT STATEMENT

ALP Policy ENV DM5 states that development schemes should seek to achieve a net gain in biodiversity. This is irrespective of whether the proposal meets the statutory requirement for achieving Biodiversity Net Gain (BNG). In this case, the proposed development is exempt from demonstrating Statutory BNG as the extension will not impact on 25sqm or more of existing habitat and therefore benefits from the de minimis BNG exemption.

The applicants propose to install a bird box on the main building to achieve biodiversity enhancement on site and the development would therefore accord with the requirements of ALP Policy DM5.

### WASTE MANAGEMENT

A communal bin store would be provided within the site, as recommended for flatted developments by ALP Policy WM DM1. Residents will carry bins from the communal bin store to the kerbside for waste collection, as per existing arrangements at surrounding residential properties.

The communal bin store will be positioned no further than 30 metres from the kerbside,

## Planning Appraisal

in accordance with the maximum carry distances recommended within the Manual for Streets (2007). The location, size and design of the bin store can be secured by way of planning condition, if required by the LPA.

### PAGHAM HARBOUR SPA CONTRIBUTION

The site lies within Buffer Zone B (0-5km) of the Pagham Harbour SPA, where all new residential development will be required to pay a developer contribution (of £938 per residential unit) towards strategic access management measures at Pagham Harbour.

The applicants would welcome discussions regarding the required level of financial contribution, if any. The justification for a reduced contribution would be based on offsetting the recreational impact of residents from the existing supported living use against the impact of ten self-contained dwellings. A similar pragmatic approach was taken at Squirrel Corner (under permission BR/107/17/PL), where the LPA offset the existing occupancy level against the proposed change—from a three-person HMO to two dwellings—and determined that no financial contribution was necessary.

### CONCLUSION

The proposed scheme for ten dwellings is supportable in principle, falling within the defined settlement boundary of Bognor Regis. The existing supported living premises has been vacant since June 2024 due to insufficient occupier demand and the proposal would bring a redundant building back into active use, preventing further deterioration.

The proposal makes efficient use of land and existing buildings, with external alterations respecting the appearance of the host building and resulting in an appropriate visual impact on the local street scene. The development ensures acceptable separation distances from neighbouring properties, preserving neighbouring levels of privacy, light and outlook as a result. The level of activity on-site would remain comparable to the existing lawful use, leading to no significant increase in noise or disruption to neighbouring residents.

The scheme provides a good standard of accommodation, exceeding the minimum space requirements set out in the Nationally Described Space Standards and providing future occupants with access to a communal outdoor area and nearby public green spaces. It has also been demonstrated that the development would cause no highways safety issues nor would it be at an unacceptable risk of flooding.

Given the poor housing delivery record and supply shortfall in Arun District, the tilted balance in favour of housing development applies as directed by the NPPF. Substantial weight must also be given to the development of under-utilised, brownfield land as set out at NPPF paragraph 125. The scheme would result in no significant harm and as such, it is respectfully requested that permission be granted without undue delay so that the benefits of the scheme can be delivered.

# WHALEBACK

[REDACTED]  
Brighton & Hove: [REDACTED]

Winchester: [REDACTED]

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