

PLANNING STATEMENT

**Loft conversion with dormer
and change of use from dwelling house (use class C3)
to 7-bed, 8-person house in multiple occupation (Sui Generis)**

Site Address

28 Argyle Road, Bognor Regis, PO21 1DZ

Applicant

Open Mind Empire LTD

Local Planning Authority

Arun District Council



Document Purpose

This Design and Access Statement has been prepared in support of a full planning application and should be read together with accompanied drawing.

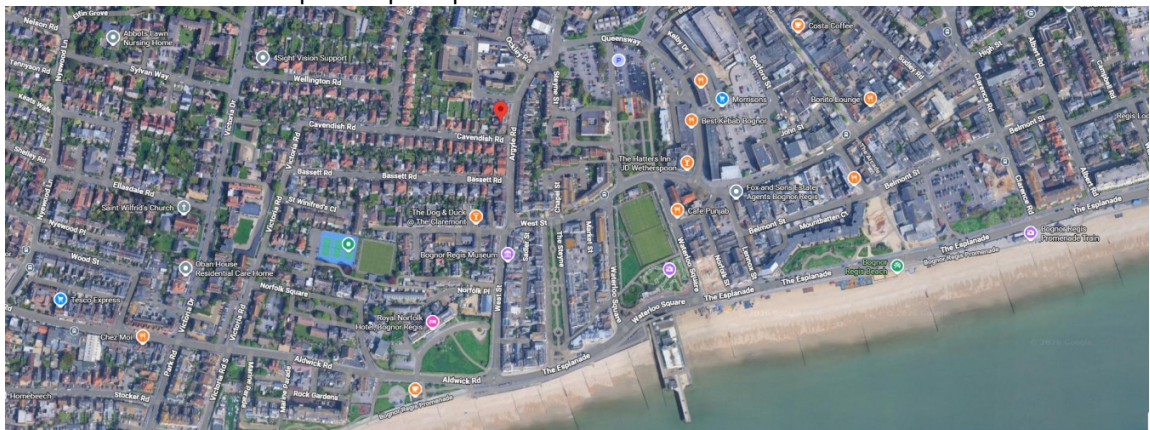
1. Introduction

This Planning Statement has been prepared in support of a planning application for the “Loft Conversion with dormer and change of use from dwelling house (Use Class C3) to a 7-bedroom House in Multiple Occupation (HMO) (Sui Generis) for a maximum of 8 occupants”.

The proposal mirrors the recently approved scheme at the adjoining and directly comparable 27 Argyle Road (Ref: BR/249/24/PL), which received planning permission on 22 May 2025. The application property is similar in layout, the proposed operational model, level of occupation, amenity provision, cycle storage, waste storage and biodiversity enhancements follow the same approved principles.

2. Site and Surroundings

- 2.1. 28 Argyle Road is a two-storey, 3 bedroom, mid-terraced property, in the Marine Ward of Bognor Regis. Argyle Road is predominantly residential street that contains a mix of single household dwellings and shared accommodation.
- 2.2. The property is of red brick construction, with a double bay window and pitched roof covered in concrete red tiles. Two storey rear outrigger is of red brick construction painted in white up to First Floor Level. A blockwork outbuilding sits at the rear of the garden, which is also accessible from an alleyway that runs from Cavendish Road and Sutherland Close. Accommodation is set over three levels, with three bedrooms at first floor level, and two more bedrooms in the roof space.
- 2.3. The property is in a bad condition and has been exposed to squatters and vandalism, and is in desperate need of redevelopment.
- 2.4. The site lies in a highly sustainable town-centre location within easy walking distance of:
 - Bognor Regis railway station
 - Local bus services (bus line 61, 62, 63, and 69)
 - London Road shops and services
 - Seafront and public open spaces



- 2.5. According to the LPAs public register, there are no previous planning applications for the property, other than a recent application for prior approval.
BR/3/26/PDH - Notification under extended permitted development rights for a single storey flat roof rear extension measuring 6m beyond the rear wall of the original dwelling house, with a maximum height of 3m and an eaves height of 3m – Prior Approval Not Required – 21/11/2024

3. The Proposal

- 3.1. Loft Conversion – existing attic to be converted into habitable space, new dormer with flat roof to be constructed at the rear of the property and velux type window provided to the front elevation. Additional roof volume would be 14m³, dormer to be covered in red plain tiles to match existing adjoining neighbour dormer and flat roof covered with EPDM rubber to match. These are considered to be permitted development under Schedule 2, Part 1, Class B & Schedule 2, Part 1, Class C, of the GDPO
- 3.2. The single storey rear extension to be constructed under extended permitted development rights approval Ref No BR/3/26/PDH
- 3.3. Solar panels are proposed to be installed on rear extension and dormer roof in order to provide renewable energy to the dwelling. These are considered to be permitted development under Schedule 2, Part 14, Class A, of the GDPO
- 3.4. Garden - the existing garage will be renovated to provide secure, bicycle store. The store will be capable of storing bicycles for all occupants, and will also provide 2no. electric bike charging points. Occupants will be advised that parking in the area is likely to be limited, and will be encouraged to use bicycles and public transport.
Along with general landscaping, a seating area and planting will be installed
- 3.5. Internal alterations:
- existing layout to be rearranged to provide en-suite bedrooms
 - large open plan kitchen/dining layout with direct access to the garden
 - all separation walls between rooms and corridors to be provided additional sound insulation layers
 - The space provided in the property has been designed to the council's HMO standards, which is detailed in the table below. The sizes are based on where occupants have communal dining facilities. Min required sizes:
Room - 6.51sqm, bathroom - 2.0sqm, Kitchen / Dining - 16sqm, single occupancy bedsit – 13sqm, double occupancy bedsit – 15sqm

Room	Floor	Occupancy	Size
Bedroom 1	GF	1	12.7sqm + 2.2 sqm ensuite
Bedroom 2	GF	1	8.7sqm + 2.2 sqm ensuite
Bedroom 3 bedsit	FF	1	17.3sqm + 2.2 sqm ensuite
Bedroom 4	FF	1	8.7sqm + 2.2 sqm ensuite
Bedroom 5	FF	1	17.8sqm + 2.4 sqm ensuite
Bedroom 6 bedsit	SF	2	16.7sqm + 2.4 sqm ensuite
Bedroom 7	GF	1	8.7sqm + 2.8 sqm ensuite
Kitchen / Utility	GF	communal	12.3sqm
Living / Dining	GF	communal	15.0sqm

4. Planning Policy Context

The proposal has been prepared having regard to the following key policies:
Arun Local Plan 2011–2031

- SD SP2 – Built-Up Area Boundary
- H SP4 – Houses in Multiple Occupation
- D DM1 – Design
- D DM2 – Internal Space Standards
- QE SP1 / QE DM1 – Residential Amenity and Noise
- T SP1 / T DM1 – Sustainable Transport and Cycle Provision
- WM DM1 – Waste Management
- ENV DM2 – Pagham Harbour Mitigation
- ENV DM5 – Biodiversity

Supplementary Guidance

- Arun Parking Standards SPD (2020)
- Arun Design Guide SPD
- National Planning Policy Framework (NPPF)

5. Principle of Development

The site lies within the Built-Up Area Boundary, where residential development and changes of residential use are acceptable in principle, subject to compliance with detailed development management policies.

The proposal is for a large HMO for 8 occupants and therefore requires planning permission as a Sui Generis use, irrespective of the Article 4 Direction.

6. Impact on Character and HMO Concentration

Policy H SP4 requires that HMOs do not adversely affect the character of the area or erode the balance of housing types.

This proposal is materially the same as the approved neighbouring property. The Council's assessment under application BR/249/24/PL concluded that the surrounding HMO concentration remained well below the accepted 5% threshold within a 250m radius.

Our study demonstrate the HMO concentration within 50, 100 radius is also below accepted 10%.

The proposal:

- introduces no harmful external alterations;
- preserves the appearance of the terrace;
- sits within an area already containing a mix of household types;
- supports a mixed and balanced community.

Accordingly, the proposal complies with Policy H SP4(a).

Study 1 – 50m radius



50m radius		
Address	Units	
Argyle Road 6-23	22	
Argyle Court 1-19	19	
Sutherland Close	1	
Argyle Road 24-25 Flats 1-10	10	
Argyle Road 26-32	9	
Cavendish Road 1-5	6	
Cavendish Road 2-4	2	
Steyne Rd 44-45	2	
Bassett Road 2-4	2	
Total	73	Density
Existing HMO	6	8.2%
Predicted HMO	7	9.6%

Study 2 – 100m radius



100m radius		
Address	Units	
Argyle Road 1-5	5	
Argyle Circus 1-5	5	
Sutherland Close 1-25	13	
Sutherland Close 2-10	5	
Argyle Road 33-35	2	
Cavendish Road 7-13	5	
Cavendish Road 6-14	4	
Steyne Rd 46-50	5	
Bassett Road 6-16	8	
West Street 10-18	5	
Argyle Hall	1	
Canada Grove 1-2	2	
Total	133	Density
Existing HMO	10	7.5%
Predicted HMO	11	8.3%

7. Residential Amenity

The proposal remains wholly residential in character.

Although occupancy increases compared with a single household, the level of occupation (8 persons) is comparable to a large family dwelling and directly mirrors the approved arrangement next door.

No harmful overlooking, overshadowing or unacceptable noise impacts will arise beyond those ordinarily associated with residential occupation.

The proposal therefore accords with:

- D DM1
- QE SP1
- QE DM1
- H SP4

8. Internal Space Standards

The proposed bedroom sizes, communal facilities, kitchen provision, bathrooms and fire safety arrangements will be designed to meet:

- Arun Private Sector Housing HMO standards
- LACORS guidance
- Chichester and Arun Landlord Accreditation Standards
- HMO licensing requirements.

9. Private Amenity Space

The property benefits from a private rear garden with access to the main road and small front garden.

The amenity area exceeds the 70sqm guideline identified within the Arun Design Guide for a shared house of this size and therefore provides adequate outdoor communal space for occupiers.

In addition, the site is within short walking distance of:

- Waterloo Square
- Hothampton Sunken Gardens
- The Promenade

This provides excellent supplementary access to open space.

10. Waste and Cycle Storage

Covered and secure cycle parking will be provided in the rear garden.

Dedicated refuse and recycling storage will be provided within the site frontage to allow easy kerbside collection.

This complies with:

- T SP1 / T DM1
- WM DM1

11. Highways and Parking

The site occupies a highly sustainable location close to:

- public transport;
- shops and services;
- employment;
- town centre facilities.

Although no off-street car parking is provided, the site's accessibility and proposed cycle facilities ensure that the development would not generate excessive parking demand or highway harm. Occupants will be advised that parking in the area is likely to be limited, and will be encouraged to use bicycles and public transport.

12. Biodiversity and Pagham Harbour Mitigation

In accordance with Local Plan Policy ENV DM5, consideration has been given to the protection and enhancement of on-site biodiversity.

The rear garden is overgrown with low value planting and weeds, with concrete footpaths.

The garden will be stripped back of the excess vegetation prior to establishing a more detailed landscaping scheme, which will look to increase the possibility of planting.

Planters and raised planters will be provided around a communal seating area.

A 'Swift Box' will be installed to the side elevation.

Although the use of the property, as well as the previously approved extension, are not considered to impact onsite or linear habitats, an overall improvement to the garden and the potential for biodiversity is proposed, and any landscaping plans will take into account the suggestions detailed in Policy ENV DM5 of the local plan.

Given the site's location within the Pagham Harbour Zone B mitigation area, the applicant acknowledges that a Section 106 contribution will be required

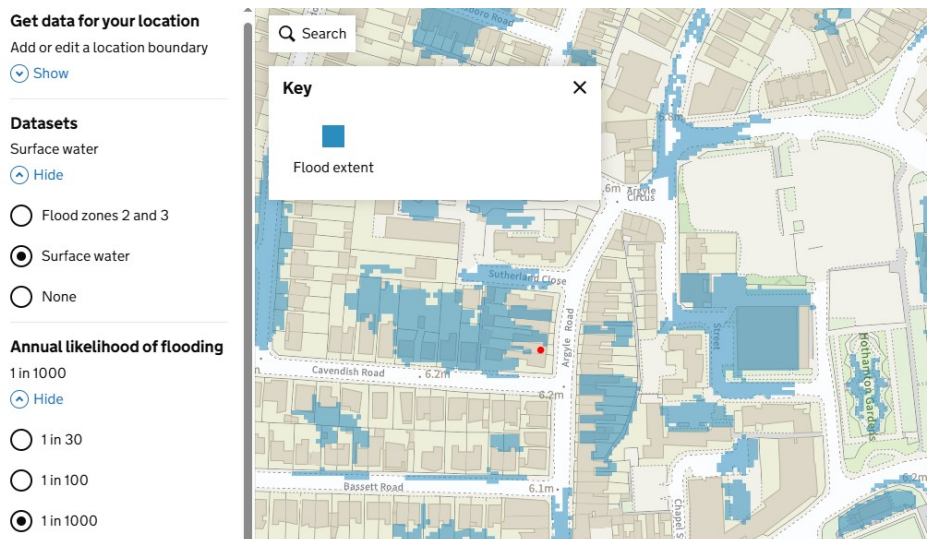
13. Sustainability and Energy Efficiency

The development will incorporate energy efficiency measures, including:

- Improved insulation – new extension and loft conversion elements would meet and exceed the current U-value requirements;
- Replaced and new windows to be Energy efficient;
- Low-energy lighting to be installed,
- New energy efficient water heating system to be provided.
- Solar panels to be installed

14. Flood Risk and Drainage

The site is located within **Flood Zone 1**, as defined by the Environment Agency's Flood Map (low probability of flooding). As such, the proposed change of use to a House in Multiple Occupation (HMO), together with minor extensions, does not trigger the requirement for a detailed Flood Risk Assessment. Surface water drainage will be managed through existing connections to the public sewer network, and any external alterations will use permeable surfaces where practicable to reduce runoff. The proposal is therefore consistent with the National Planning Policy Framework.



Environment Agency Risk of Flooding from Surface Water mapping indicates that the rear part of the site is located within an area of low to medium risk of surface water flooding. This is likely to occur during periods of intense or prolonged rainfall when drainage capacity is exceeded.

One of the proposed bedrooms would be located within this area.

The following measures will be implemented to ensure the development is safe for its lifetime:

- The finished floor level of the rear extension will be set at the existing Ground Floor Level which is around 250mm above existing external ground levels
- Water butts to be installed for garden use
- Permeable paving will be used in external areas
- Raised electrical sockets and services in the affected area to be provided
- Surface water from roofs only will be discharged to the existing drainage network and the existing drainage system to be jet cleaned during construction and well maintained thereafter
- occupiers will be advised of the potential surface water flooding risk and the need to report drainage issues promptly.
- Emergency access to Argyle Road and Cavendish Road would remain available during extreme weather events.

15. HMO Management

The property will be professionally managed and will include:

- Waste and recycling arrangements;
- Maintenance programmes;
- Clear tenancy agreements;
- Complaints and monitoring procedures.

Occupancy will be limited to a maximum of 8 residents by condition

16. Conclusion

The proposed change of use of 28 Argyle Road to a 7-bedroom, 8-person HMO is fully supported by local and national planning policy.

The scheme replicates the recently approved adjoining development and will:

- provide needed shared housing accommodation;
- preserve the character of the area;
- avoid harm to neighbouring amenity;
- provide adequate internal and external living standards;
- offer secure cycle and waste storage;
- promote sustainable town-centre living.

The proposal is considered suitable for approval