

# ECE Planning

## Planning Statement

### St Juliana's Convent Bognor

January 2025



# ECE Planning

---

Project Name: St Juliana's Convent, Bognor

Location St Juliana's Convent, Marian Way, Bognor  
Regis, PO21 1PA

Client: Slasco Properties

File Reference: P2182

Issue	Date	Author	Checked	Notes
Rev A	22.11.2024	S Lower	S Sykes	Initial Draft
Rev B	07.11.2024	S Sykes	S Sykes	Client Draft
Rev C	16.01.2025	S Lower	S Sykes	Final Issue

## Contents

Figures .....	4
1. Introduction .....	5
2. The Site .....	6
3. Planning History .....	10
4. The Proposal .....	11
5. Policy Overview .....	12
5.1. Introduction .....	12
5.2. National Planning Policy Framework (NPPF) .....	12
5.3. Planning Practice Guidance (NPP) .....	12
5.4. Arun Local Plan (2018) .....	13
5.5. Bognor Regis Neighbourhood Development Plan (2015) .....	14
5.6. Supplementary Planning Documents (SPDs) .....	14
6. Planning Appraisal .....	15
6.1. Introduction .....	15
6.2. Principle of Development .....	15
6.3. Affordable Housing .....	17
6.4. Heritage .....	18
6.5. Highways, Access and Parking .....	18
6.6. Flood Risk and Drainage .....	19
6.7. Ecology, Biodiversity and Landscaping .....	20
6.8. Sustainability .....	21
6.9. Other Matters - Cessation of the Section 52 Agreement .....	21
7. Conclusions .....	23
Appendix A – Pre-Application Feedback PAA/81/24/ .....	24
Appendix B - Letter of support from the Market Development Lead Commissioner at WSCC .....	25

## Figures

Figure 1- The Site .....	6
Figure 2- St Juliana's Convent .....	7
Figure 3- Bognor Regis Hotham Park Conservation Area Map .....	7
Figure 4- Historic England Maps for Planning .....	8
Figure 5- Flood Maps for Planning .....	8
Figure 6: Future Flood Risk .....	20

## 1. Introduction

- 1.1. This Planning Statement has been produced by ECE Planning on behalf the Applicant, **Slasco Properties**, in support of a Full Planning Application at St Juliana's Convent ('the Site'). The description of the proposal reads:

*'Change of Use from Convent (Sui Generis) to Residential Use (C3) for Adults with Learning Difficulties and Autism and minor amendments to external appearance'.*

- 1.2. The Applicant has previously undertaken Pre-Application discussions with Arun District Council which culminated in a response dated 28 November 2024 (reference PAA/81/24/). The detailed response of the Pre-Application Advice can be found at **Appendix A**.
- 1.3. The proposals have also been informed by the National Planning Policy Framework (December 2023 version), the Planning Practice Guidance and the Arun Local Plan.
- 1.4. This Planning Application should be considered with full regard to the following suite of supporting documents, drawings, and plans:
- Planning Application, Notice and CIL Forms
  - Planning and Design and Access Statement
  - Architectural Drawings including Site Location and Block Plan, Proposed Site Layout, Floorplans and Elevations
  - Flood Risk and Drainage Assessment
  - Ecology Statement
  - Heritage Statement

- 2.2. The Site is accessed from High Street onto Marian Way, a private road, which also gives access to the adjoining development of Arran Gate.
- 2.3. The Site is within close proximity to the town centre and the variety of shops, facilities and services associated with the town. Sustainable transport options are available with bus stops located a short walk away on the High Street with the train station located 1 km walking distance to the west.

# ECE Planning

- 2.4. The surrounding context is made up of a mix of uses including Hotham Park to the north, Butlins holiday resort to the east, residential uses to the west with the Bognor Regis Job Centre and other residential uses located to the south.



Figure 2- St Juliana's Convent

- 2.5. The Site comprises a part two storey part single storey building. The single storey element is arranged around a central courtyard whilst the two storey element features an atrium with various rooms off this feature including a Chapel space. On the south side of the property there is a conservatory-style extension which overlooks the amenity garden areas. Additionally, there is a detached double garage at the north east of the site. The building is constructed using traditional brick with pitched slate roofs.
- 2.6. The Site is located adjacent to the Bognor Regis Hotham Park Conservation Area (Figure 3).

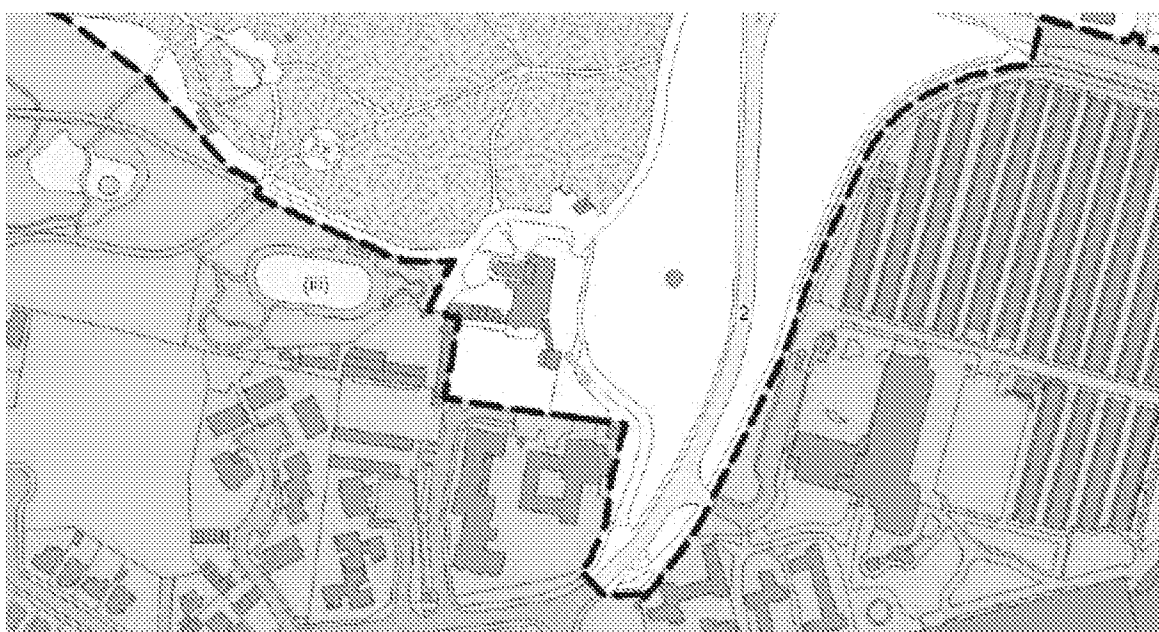


Figure 3- Bognor Regis Hotham Park Conservation Area Map

- 2.7. The Site is also located close to Hotham Park House (Grade II\* Listed Asset) and Sudley Lodge (Grade II Listed Asset). Refer to Figure 4.

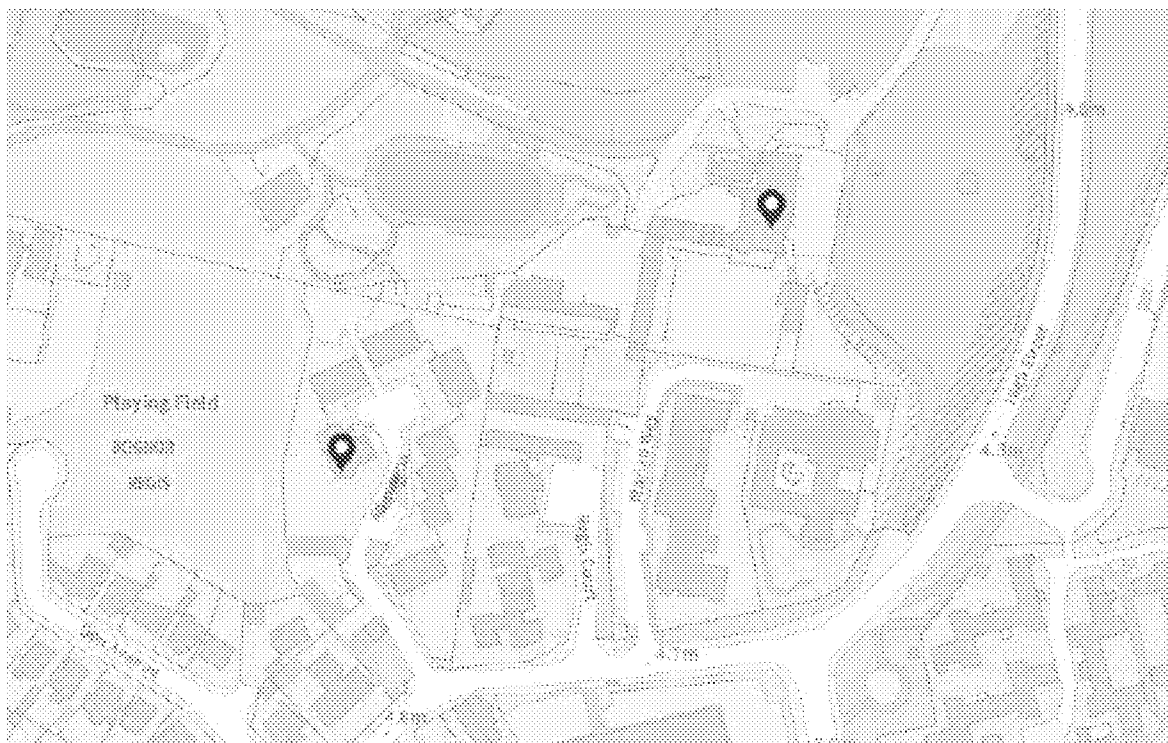


Figure 4- Historic England Maps for Planning

- 2.8. A small part of the Site is located in Flood Zone 2, which means the Site has a medium probability of flooding from rivers and the sea. The Site is also located within Future Flood Zone 3a. Refer to Figure 5. The site is not subject to any surface water flooding issues.

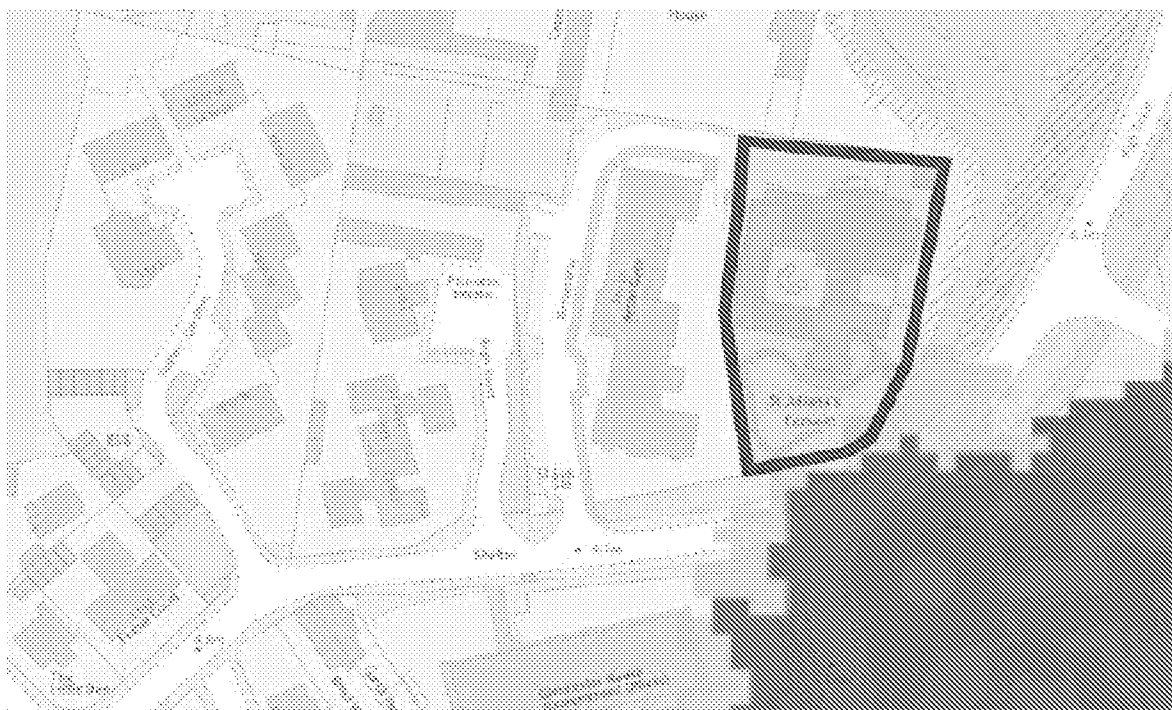


Figure 5- Flood Maps for Planning



- 2.9. The Site has several additional designations relevant to this application. It is located within Pagham Harbour Zone B, an Economic Growth Area, the 2km buffer zone for the Site of Special Scientific Interest (SSSI), and CIL Charging Zone 4.

## 3. Planning History

- 3.1. A review of Arun District Council's online register revealed the following relevant planning history pertaining to the site. As follows,

### *Planning Applications*

- 3.2. **Reference BR/486/85.** New Covent and Garages. Approved 18 April 1986.
- 3.3. **Reference BR/149/93.** Extension to east wing to provide laundry room and store area. Approved 13 August 1993.
- 3.4. **Reference BR/187/94.** Alteration to access & parking with addition of four rooms & bathroom. Approved 26 August 1994.
- 3.5. **Reference BR/165/97.** New conservatory adjacent to sitting room to form sun lounge. Approved 29 August 1997.
- 3.6. **Reference BR/164/97.** Addition of toilet and storage areas within courtyard. Approved 2 September 1997.

### *Pre-Application Advice PAA/81/24/*

- 3.7. **Reference PAA/81/24/.** Pre-Application Advice and Meeting Request for the Change of Use from Convent to Residential Use for Adults with Learning Difficulties and Autism.
- 3.8. As set out briefly in Section 1 of this Statement, the Applicant has previously undertaken Pre-Application discussions with Arun District Council which culminated in a response dated 26 November 2024. Please refer to **Appendix A** for a copy of the Pre-Application advice received.
- 3.9. In summary, the response concluded that,
- 'Based on the above comments it is concluded that were an application for permission to be submitted for the change of use of the Convent to Residential Use for Adults with Learning Difficulties and Autism, it would likely be approved. This would be subject to additional details in regard to heritage assets, parking, biodiversity, waste management and flooding being acceptable'.*
- 3.10. The additional details suggested by the Officer have been submitted with this application in full.

## 4. The Proposal

- 4.1. The proposal seeks to transform the currently disused convent into a facility to accommodate a total of 14 one-bedroom self-contained units. The overall proposal aims to repurpose the existing structure to provide a well-integrated mix of one-bedroom bungalows and flats, with a particular focus on accessibility, communal living, and support functions.
- 4.2. A registered housing provider is likely to take responsibility for managing the facility, working closely with a care provider. The design of the flats will allow flexibility, catering to both residents capable of independent living and those requiring 24/7 care (although it is likely that all residents will require a minimum of 20 hours of care per week). In addition to the residential units, the facility will include essential shared spaces, such as a staff office, a communal lounge, and activity room for residents.
- 4.3. **Bungalows:**
- There are eight no. one-bedroom bungalows on the ground floor, ranging in size from 41 sqm to 52 sqm.
  - Three of these bungalows are wheelchair-accessible, designed with larger layouts (minimum of 55 sqm). The bungalows are M4(3) compliant.
  - Each bungalow includes a bedroom, bathroom, kitchen, and living area, some of which have access to the internal courtyard area.
  - Three bungalows have access to a small private courtyard area.
- 4.4. **Flats:**
- The ground and first floors feature six no. one-bedroom flats (within the two-storey element). The flats range from 41 sqm to 49 sqm.
  - Each flat includes a bedroom, bathroom, kitchen, and living space.
  - One flat has access to a small private courtyard area.
- 4.5. **Communal and Staff Areas:**
- There is a communal lounge and activity room located on the ground floor, providing shared space for residents (within the conservatory).
  - A centrally located communal courtyard area is provided on the ground floor.
  - Multiple staff rooms and support facilities are located throughout, including bathrooms and workspaces to facilitate care or support services within the building.
- 4.6. There are specific modifications to ensure accessibility throughout the building, such as designated escape routes and door access to gardens from ground floor flats. As shown on the elevations, some doors have been improved with a limited number of fenestration amendments also. The windows and doors shall be replaced on a like for like basis. The chapel, which currently occupies a full two storeys, is proposed to be removed and replaced at both ground and first floors as part of the proposal. The ground floor area will increase slightly as a result.
- 4.7. Seven no. car parking spaces are proposed to be retained for staff / visitors. Bicycle storage is proposed in garage space. Please refer to submitted architectural drawings for further information on the scheme.

## 5. Policy Overview

### 5.1. Introduction

- 5.1.1. A key role of the planning system is to regulate the development and use the land in the public interest. At the heart of the planning framework are Statutory Development Plans, which seek to guide the decision making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, and application for planning permission shall be determined in accordance with the Development Plan, unless material consideration indicate otherwise.

- 5.1.2. In this case the Development Plan for the area, consists of the following:

#### **The Arun Local Plan (2018)**

#### **Bognor Regis Neighbourhood Development Plan**

- 5.1.3. The section considers how the proposed application complies with relevant National and Local Policy.

### 5.2. National Planning Policy Framework (NPPF)

- 5.2.1. The NPPF, most recently amended in December 2024, sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

- 5.2.2. The following extracts of the NPPF are considered most relevant in the determination of this application. The below are not explored in detail within this Statement but have been fully reviewed in preparation of this application.

#### **Chapter 2 (Achieving Sustainable Development)**

#### **Chapter 5 (Delivering a Sufficient Supply of Homes)**

#### **Chapter 8 (Promoting Healthy and Safe Communities)**

#### **Chapter 9 (Promoting Sustainable Transport)**

#### **Chapter 11 (Making Effective use of Land)**

#### **Chapter 12 (Achieving well-designed places)**

#### **Chapter 14 (Meeting the challenge of climate change, flooding and coastal change)**

#### **Chapter 15 (Conserving and enhancing the natural environment)**

#### **Chapter 16 (Conserving and enhancing the historic environment)**

### 5.3. Planning Practice Guidance (PPG)

- 5.3.1. The PPG supplements the overarching objectives of the National Planning Policy Framework. The guidance provided by the PPG has been fully considered in the creation of the application and the proposed plans are seen to be fully compliant with it.

## 5.4. Arun Local Plan (2018)

- 5.4.1. The recently adopted Arun Local Plan 2018 sets out the strategic vision, objectives, policies and proposals for the development of the LPA to 2030 and beyond. The following policies in the Local Plan are considered relevant to this application but are not explored in detail in this Statement:

**AH SP2 (Affordable Housing),**

**D SP1 (Design),**

**D DM1 (Aspects of Form and Design Quality),**

**D DM2 (Internal Space Standards),**

**D DM4 (Extensions / Alterations to Existing Buildings),**

**ECC SP1 (Adapting to Climate Change),**

**ECC SP2 (Energy and Climate Change Mitigation),**

**ENV DM2 (Pagham Harbour),**

**ENV DM3 (Biodiversity Opportunity Areas),**

**ENV DM5 (Development and Biodiversity),**

**ENV SP1 (Natural Environment),**

**H DM2 (Independent Living and Care Homes),**

**HER DM1 (Listed Buildings),**

**HER DM3 (Conservation Areas),**

**HER SP1 (Historic Environment),**

**H SP1 (Housing Allocation),**

**QE DM1 (Noise Pollution),**

**QE SP1 (Quality of the Environment),**

**SD SP1 (Sustainable Development),**

**SD SP2 (Built-Up Area Boundary),**

**T SP1 (Transport and Development),**

**W DM1 (Water Supply and Quality),**

**W DM2 (Flood Risk),**

**W DM3 (Sustainable Urban Drainage Systems),**

**WM DM1 (Waste Management)**

## 5.5. Bognor Regis Neighbourhood Development Plan (2015)

- 5.5.1. The following policies in the Local Plan are considered relevant to this application but are not explored in detail in this Statement:

**Policy 4- Reducing underuse of property in the Town Centre**

**Policy 6- Key Gateways and Promotion of Sustainable Travel**

**Policy 8 – Pre-application and Consultation**

**Policy 8a – Design Excellence**

**Policy 8b- Car Parking**

## 5.6. Supplementary Planning Documents (SPDs)

- 5.6.1. The following Supplementary Planning Documents (SPDs) have been prepared by the LPA to provide additional advice and guidance on specific planning issues within the district. They are non-statutory documents but are a material consideration that the council will take into account when considering an application.
- 5.6.2. The following are considered relevant in the determination of the application but are not explored in detail within this Statement.
- Parking Standards SPD (January 2020)
  - Design Guide SPD (January 2021)

## 6. Planning Appraisal

### 6.1. Introduction

- 6.1.1. This section of the Statement details how the proposed development complies with the policies set out within the Development Plan. The following matters are the principal considerations with regards to the proposal:

**Principle of Development**

**Affordable Housing**

**Heritage**

**Highways, Access and Parking**

**Drainage and Flood Risk**

**Biodiversity**

**Other Matters**

### 6.2. Principle of Development

- 6.2.1. The Saint Juliana's Convent was previously operated as a religious residential care facility but has since closed, we understand, due to a lack of demand for convalescent care for Catholic nuns. The convent is currently unoccupied and lies vacant.
- 6.2.2. The proposals seek to transform the currently disused convent into a facility offering a total of 14 flats / bungalows, each designed for one resident. The facility is intended to support individuals with learning disabilities and autism. The care provided will range from residents requiring higher levels of care (up to 24 hours) and others requiring less assistance (but generally a minimum of 20 hours of care per week).
- 6.2.3. The property requires modernisation to meet current standards, and this proposal offers a sustainable future use that will benefit the community. The conversion of the convent into a residential facility will help address the shortage of specialist housing for individuals with learning disabilities and autism, offering both independent and supported living solutions within a single, adaptable development.
- 6.2.4. The proposal offers a direct benefit to the community by providing housing for individuals who are unlikely to find appropriate accommodation in the open market. In so doing, the proposal shall provide a well-managed, efficient facility run by a Registered Provider / Care Provider. This project is focused on providing care for adults with learning disabilities and autism, for which a significant need exists.
- 6.2.5. According to recent local assessments, the demand for such accommodation far exceeds the available supply. The West Sussex Adults<sup>1</sup> Social Care Commissioning Strategy 2023 to 2025 sets out the needs associated with care provision for vulnerable people in West Sussex.
- 6.2.6. The data from the West Sussex Commissioning Strategy highlights a significant need to improve care and support services for adults with learning disabilities, autism, and mental health conditions in the area.

---

<sup>1</sup> [https://www.westsussex.gov.uk/media/20507/asc\\_commissioning\\_strategy.pdf](https://www.westsussex.gov.uk/media/20507/asc_commissioning_strategy.pdf)

6.2.7. Key statistics underline the scale of this need:

- An estimated 17,200 people aged 15+ years in West Sussex have a learning disability.
- Approximately 5,100 people are registered with GP practices for learning disabilities, including 300 individuals with Down's syndrome.
- Around 1,100 adults (18+) are estimated to have autism.
- The 2019 school census recorded 1,317 pupils with autism as their primary special educational need.

6.2.8. The county has a high number of residential services but lacks sufficient supply of less restrictive, flexible support that meets the needs of individuals, particularly those with complex conditions like autism. Furthermore, services are facing pressures due to changing policies, financial constraints, and the challenge of meeting increasingly diverse and complex needs. Despite these challenges, the council is dedicated to developing quality and value-for-money services through new approaches and strategies. The strategy notes that,

*'the market does not appear to have sufficient supply available to meet the needs of individuals with complex needs such as individuals with autism.'*

6.2.9. The proposed development will address the current gaps in services by providing much-needed support and housing solutions contributing to the stability and diversity of support services in West Sussex, addressing a pressing need for suitable and supportive living environments. In addition, **Appendix B** is a letter of support from the Market Development Lead Commissioner at WSCC in which the Councill state:

*I can confirm that there is a significant need for all age specialist accommodation in the area for adults aged 18 years plus that require specialist care and accommodation.*

6.2.10. The proposed conversion of the convent into a residential facility helps address the growing demand for specialised housing. By providing dedicated flats for individuals with varying levels of care needs, the project aims to address the existing shortfall in appropriate accommodation.

6.2.11. **Policy H DM2** of the Local Plan states,

*New and extended independent living and care homes will be permitted where applications can demonstrate the following and where the proposal is consistent with all other Local Plan policies:*

- a. The scheme is located within the Built Up Area Boundary if it is a new facility.*
- b. The scheme shall be easily accessible either by foot or public transport, to community and social facilities e.g. shops, post offices, healthcare, community facilities*
- c. The design of the scheme shall be such that it can be easily adapted to the varying needs of the users of the scheme*
- d. The design and scale of the scheme shall be appropriate to the local context*
- e. Amenity space shall be provided*



*f. Overall, the scheme should be located where it would support and encourage the continuation of a healthy, active lifestyle*

6.2.12. The Site is located within a highly sustainable location within the Built-Up Area Boundary. It makes the best use of a brownfield site, sustainably reusing and converting a facility of which there is no longer any demand. The design is not impacted by the proposal, since it is a change of use application, and the proposal provides for amenity space within the grounds. It is considered that all criteria set out in Policy H DM2 are met.

6.2.13. The NPPF requires Local Plan policies to deliver a wide choice of quality homes by planning for a mix of housing based on current and future demographic projections, market trends and the differing needs of the various sectors of the community. Again, this proposal meets this requirement by ensuring those with learning difficulties and autism have suitable living accommodation within the District.

6.2.14. In summary, it is considered that the conversion of the convent into a residential facility will help address the shortage of specialist housing for individuals with learning disabilities and autism, offering both independent and supported living solutions within an existing care facility, for which there is significant need. This should carry significant weight in the planning balance.

6.2.15. In addition, the Case Officer notes in the Pre-Application Response (ref: PAA/81/24/) that,

*'The proposal would be for 14 No. supported living units which would make a positive contribution to the current HLS shortfall and help to meet local housing needs. The need for residential housing for adults with learning difficulties and autism is significant within the District, with written support provided by WSCC Adult Services identifying this fact.*

*This development would therefore be of substantial benefit in supplying this specialist form of supported living facility. The proposal meets the economic, social, and environmental aspects of sustainable development, and as such the principle of this change of use is acceptable'.*

6.2.16. It is therefore considered the proposal is acceptable in principle.

## 6.3. Affordable Housing

6.3.1. The proposals seek to provide residential accommodation for individuals who have learning disabilities and autism.

6.3.2. **Policy H DM2** of the Local Plan states,

*For all developments of 11 residential units or more the Council will require a minimum 30% of the total number of units proposed on site to be provided as affordable housing on the same site in the first instance.*

6.3.3. The facility will be funded by public funds, through a mixture of Local Authority funding and Central Government funding and it will rely on public resources to operate. Given that this project is designed to meet a critical public need, imposing additional affordable housing requirements would be unreasonable.

6.3.4. The development directly addresses the shortage of specialist housing in the community and fulfils a specific social care need. We believe this provision should negate the need for affordable housing and the need to be compliant with Policy H DM2 of the Local Plan,

6.3.5. The Case Officer notes in the Pre-Application Response (ref: PAA/81/24/) that,

# ECE Planning

---

*'In accordance with Policy AH SP2, all developments of 11 residential units or more are required to provide a minimum of 30% of the total units proposed as affordable housing. This is where it cannot be proven that the 30% affordable housing provision is not viable. Of the 14 units proposed, this would require a minimum of 4.2 units be affordable. However, given the speciality of this development, and its significant need within the District, the requirement to comply with AH SP2 should be considered pragmatically.'*

- 6.3.6. Given the specialist nature of this proposal it is our view that onsite affordable housing should not be required. Notwithstanding this position, the Vacant Building Credit, set out within the NPPG and referred to in paragraph 65 of the NPPF. It is our view therefore that the proposals are exempt from Affordable Housing.

## 6.4. Heritage

- 6.4.1. As set out earlier, the site is located on the edge of Bognor Regis Hotham Park Conservation Area and is close to Hotham Park House (Grade II\* Listed Asset) and Sudley Lodge (Grade II Listed Asset).
- 6.4.2. Apart from replacing the windows on a 'like for like' basis and minor amendments to doors and windows, there will be no further external amendments to the building. All design changes will relate to the interior of the building solely to facilitate the use of the scheme.
- 6.4.3. Given the limited amendments and the lack of any intervisibility between the site and heritage assets, it is considered that the proposal will have no effect on the setting of the conservation area or the listed buildings. Therefore, the proposals comply with Policy HER DM1 and **Policy DM3** in heritage terms.

## 6.5. Highways, Access and Parking

- 6.5.1. Policy T SP1 of the Arun Local Plan requires development to incorporate appropriate levels of parking in line with West Sussex County Council guidance on parking provision, taking into consideration the impact of development upon on-street parking. The Arun Parking Standards SPD sets out parking requirements for developments.
- 6.5.2. It is not anticipated that future residents will be car users. As such, parking provision will primarily accommodate staff and visitors. The WSCC guidance for this form of development sets out that requirements will be based on a site specific assessment basis.
- 6.5.3. The site is located in Parking Behaviour Zone 4 suggesting a highly sustainable location. The site benefits from its proximity to the Town Centre and several public transportation options, including bus stops and Bognor Regis Train Station, all within walking distance, reducing the need for resident parking.
- 6.5.4. The Case Officer notes in the Pre-Application Response (ref: PAA/81/24/) that,

*'As the change of use would be Sui-Generis, the Arun Parking Standards does not provide a minimum number of vehicle and cycle parking spaces that must be provided. Rather, parking provision will be determined on a case by case basis on travel plan and needs. At present, from the details submitted it is unclear how many members of staff are proposed on site at any one time, and therefore it cannot at this stage be concluded whether the parking provision on site will be sufficient. This number of spaces, given the location of the site, is likely to be acceptable'*

# ECE Planning

---

- 6.5.5. The proposed parking would utilise the existing parking arrangements, located to the front of the entrance of the site (providing for six spaces). It is likely that the total number of staff working at the site at any one time would be a maximum of six staff. Given the propensity for carers to live locally / use public transport, and the part time nature of certain staff members, we consider this provision to be appropriate in this location. In addition, the site is near to existing public car parking provision for staff / visitors should this be required. Cycle parking is proposed with the existing garage and the level proposed is considered to be appropriate however this can be secured through an appropriately worded planning condition if necessary.
- 6.5.6. Vehicular access would remain as existing off the High Street through Marian Way where acceptable visibility splays can be achieved.
- 6.5.7. NPPF Paragraph 116 states that 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'. The proposed development is considered likely to have neutral impact on the highway network given the previous use for the site and will use an existing safe access. It is subsequently considered that the proposal is acceptable in highway safety and highway network terms.
- 6.5.8. To conclude, the proposals are considered to be acceptable in relation to all highways matters.

## 6.6. Flood Risk and Drainage

- 6.6.1. The Government's Flood Maps for Planning indicates that the site is situated very marginally within existing Flood Zone 3 (FZ3) which means that the land has a high probability of flooding. It should however be noted that the land is situated predominantly within Flood Zone 1 which means it has a low probability of flooding.
- 6.6.2. As a result of the building falling slightly within the existing Flood Zone 3, a Flood Risk Assessment has been prepared in support of the application.
- 6.6.3. Policy W DM2 of the Council's Local Plan states that development in areas at risk from flooding, identified on the latest Environment Agency flood risk maps and the SFRA, will only be permitted where all of the following criteria have been satisfied:
- a. The sequential test in accordance with the National Planning Policy Guidance has been met.*
  - b. A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.*
  - c. The sustainability benefits to the wider community are clearly identified.*
  - d. The scheme identifies adaptation and mitigation measures.*
  - e. Appropriate flood warning and evacuation plans are in place; and*
  - f. New site drainage systems are designed to take account of events which exceed the normal design standard i.e., consideration of flood flow routing and utilising temporary storage areas.*
- 6.6.4. The pre application response noted:

*Future flood risk as a result of climate change must be considered as part of this FRA. You should consult the online National Planning Policy Guidance (NPPG) on flooding to ensure that your scheme complies with the guidance and all relevant documentation is submitted with your application. As the application would be for a change of use, it is not necessary that the sequential test is undertaken, nor any sustainability benefits are identified, however a site-specific FRA (or statement) must be provided demonstrating the development would not put lives or property at risk of flooding.*

- 6.6.5. The Council's SFRA has been consulted and shows part of the site as falling within future Flood Zone 3a. However, the building would be unaffected, with only the garden area being impacted in only the most extreme events in the year 2111. It is considered that given the staffed and managed nature of the proposal that should flooding occur staff will be able to ensure resident safety during time of flooding. Residents will be able to stay within the property thereby avoiding risks.
- 6.6.6. Given that no external extensions are proposed and the footprint of the building is staying the same, the scheme will not increase flood risk elsewhere.
- 6.6.7. As a result, the proposal is considered to be acceptable from a flood risk perspective.

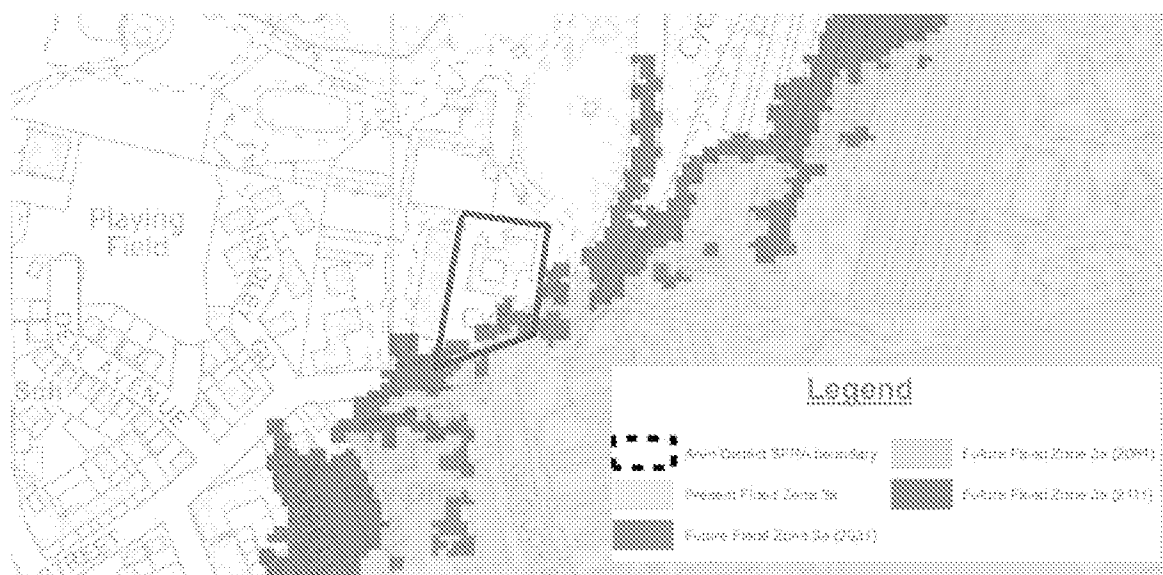


Figure 6: Future Flood Risk

- 6.6.8. No changes are proposed to the external drainage facilities including in relation to both surface water and foul drainage. The proposal is predominantly for internal changes with limited external amendments. However, water butts could be introduced for communal / private areas as a means of reducing rainwater runoff and this can be secured by an appropriately worded condition. In terms of foul drainage, the proposal would result in a reduction of bed spaces / toilet provision from the existing use and would therefore result in a reduction of foul sewage from the site.
- 6.6.9. In flooding and drainage terms, the proposal is considered to be acceptable.

## 6.7. Ecology, Biodiversity and Landscaping

- 6.7.1. The NPPF seeks to conserve and enhance the natural environment, and it is noted that biodiversity net gain has become a legal requirement from January 2024 for major redevelopment sites.

# ECE Planning

---

- 6.7.2. The need to further conserve, restore and enhance biodiversity is also reflected within Policy ENV DM5 of the Local Plan.
- 6.7.3. Given that there will be no external amendments, and the scheme purely seeks to change the use of the building, BNG will be exempt since it falls below the 25 square metre threshold.
- 6.7.4. It is however confirmed that there is ample space on site to accommodate biodiversity enhancement measures with the garden area and ultimately result in biodiversity net gain. Suggested improvements could include, for instance, bird boxes, bat boxes, insect hotels and hibernacula features such as wood piles all of which can be secured by an appropriately worded condition.

## 6.8. Sustainability

- 6.8.1. Policy ECC SP2 of the Adur Local Plan is relevant. It seeks proposals to achieve energy efficiency and incorporate renewable and low carbon energy supply systems.
- 6.8.2. The proposal represents a highly sustainable form of development by reusing and repurposing an existing structure, thereby minimising the embodied carbon impact associated with the original building.
- 6.8.3. The proposal also provides an opportunity to enhance the building's operational energy efficiency by replacing and upgrading the windows and doors, thereby improving both insulation properties and air tightness. Additionally, the internal wall build-up will be upgraded to enhance the fabric performance, further boosting energy efficiency and reducing heating requirements.
- 6.8.4. The policy also requires a 10% energy requirement to be achieved through provision of onsite renewable / low energy generation. Should the Council require the applicant to meet this policy, roof mounted solar panels could potentially be provided to deliver 10% of energy use. These have not been shown on the roof plan as we consider them unnecessary in light of the fabric improvements proposed but could be secured through an appropriately worded planning condition if necessary.
- 6.8.5. In sustainability terms, the proposal is considered to be acceptable.

## 6.9. Other Matters - Cessation of the Section 52 Agreement

- 6.9.1. This application seeks planning permission for the change of use of the existing convent to a residential facility for adults with autism and learning disabilities. The site is currently subject to a Section 52 Agreement, imposed under the provisions of the Town and Country Planning Act 1971, which restricts the occupation and use of the property. Given the proposed change of use and the significant shift in the operation of the site, it is expected that the existing S52 agreement would cease to apply as part of this application process.
- 6.9.2. **Justification for the Cessation of the Section 52 Agreement**
- 6.9.3. The existing S52 Agreement was imposed in a historical planning context and is no longer relevant given the proposed change of use. The following key considerations support the position that the agreement should be discharged:
- 6.9.4. **Restrictive Use**
- 6.9.5. The convent previously functioned as a facility for convalescing nuns above a specified restricted age (originally pensionable age). The proposed change of use cannot contain the same restrictions as specified in the S52 as it will cater for a much broader spectrum of age groups.

## 6.9.6. **Modernisation of Planning Obligations**

- 6.9.7. The S52 Agreement was secured under an outdated legislative framework, and since the Planning and Compulsory Purchase Act 2004, the approach to planning obligations has evolved. Contemporary planning practice relies on Section 106 Agreements to regulate site-specific requirements. Retaining an outdated S52 Agreement in this context is inconsistent with modern planning approaches.

## 6.9.8. **Alignment with National and Local Planning Policy**

- 6.9.9. The National Planning Policy Framework (NPPF) supports the efficient reuse of land and buildings, particularly where it meets an identified local housing need.
- 6.9.10. The Arun District Local Plan promotes the adaptive reuse of buildings and inclusive communities. The proposal provides specialist residential accommodation that meets an established need within the district, supporting policy objectives.
- 6.9.11. The retention of the S52 restriction would unreasonably constrain the use of the site, contradicting current planning policy priorities and undermining its potential to provide much-needed accommodation.

## 6.9.12. **Precedent for the Removal of Outdated Planning Obligations**

- 6.9.13. There is precedent within Arun District Council for the removal or modification of historic planning obligations where they no longer serve a planning purpose.
- 6.9.14. Previous applications, such as BR/232/17/PO, have demonstrated that restrictions based on outdated definitions of occupancy (e.g., “state pensionable age”) can be successfully varied or removed to reflect modern policy considerations.
- 6.9.15. Given the above considerations, it is expected that through the application process, the existing Section 52 Agreement would cease to apply. The planning application presents a clear and justified case for the lawful change of use, aligning with national and local planning policies while ensuring the site is appropriately repurposed in a manner consistent with its historic and ongoing residential function.
- 6.9.16. Accordingly, it is anticipated that the local planning authority will support the removal of the S52 Agreement to facilitate the delivery of the proposed development. We request written confirmation on this point from the Local Planning Authority as part of the determination process of this planning application.

## 7. Conclusions

- 7.1. This Planning Statement has been produced by ECE Planning on behalf the Applicant, **Slasco Properties**, in support of a Full Planning Application at St Juliana's Convent ('the Site'). The description of the proposal reads:

*'Change of Use from Convent (Sui Generis) to Residential Use (C3) for Adults with Learning Difficulties and Autism and minor amendments to external appearance'.*

- 7.2. The Saint Juliana's Convent was previously operated as a religious residential care facility but has since closed, we understand, due to a lack of demand for convalescent care for Catholic nuns. The convent is currently unoccupied.
- 7.3. The proposal seeks to transform the currently disused convent into a facility to accommodate a total of 14 one-bedroom self-contained residential units.
- 7.4. The proposed development makes efficient use of a brownfield site in a highly sustainable location to meet the severe need of specialist accommodation in the district.
- 7.5. The change of the use of the site would sustain the existing appearance of the building with minor modifications to windows and doors. This is considered acceptable in design and heritage terms.
- 7.6. Appropriate facilities are proposed for cycle and vehicle parking and the scheme will have no impact on the highway network.
- 7.7. The proposal has also been demonstrated to be safe from flooding and will have no impact in terms of surface water / foul drainage.
- 7.8. The proposal can also achieve improvements in relation to biodiversity through improvements to the garden spaces.
- 7.9. The proposed development is therefore considered to be in accordance with local planning policy and National Planning Policy Framework, and we respectfully request that planning permission is approved without delay.

# ECE Planning

---

## Appendix A – Pre-Application Feedback PAA/81/24/





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

Sam Sykes  
ECE Planning  
64-68 Brighton Road  
Worthing  
BN11 2EN

Date: 26th November 2024

Please ask for: Hannah Kersley  
Tel: 01903 737856

Your Ref:  
Our Ref: PAA/81/24/

Dear Mr Sykes,

## Pre-Application Advice

Pre-Application Advice and Meeting Request for the Change of Use from Convent to Residential Use for Adults with Learning Difficulties and Autism.

St Juliana's Convent Marian Way Bognor Regis PO21 1PA

I write regarding the above matter and your enquiry received on 03 October 2024.

## SCOPE OF PRE-APPLICATION ADVICE

From the details submitted it is understood that you are seeking advice for the proposed Change of Use from Convent to Residential Use for Adults with Learning Difficulties and Autism. This advice will focus on the principle of this Change of Use, alongside relevant issues on the site regarding space standards, amenity, flooding, biodiversity, access and parking, and heritage.

**RELEVANT POLICIES AND GUIDANCE** - the following policies are considered relevant to your proposal:

### Arun Local Plan 2011-2031

<u>AHSP2</u>	AH SP2 Affordable Housing
<u>DDM1</u>	D DM1 Aspects of form and design quality
<u>DDM2</u>	D DM2 Internal space standards
<u>DDM4</u>	D DM4 Extensions&alter to exist builds(res and non-res)
<u>DSP1</u>	D SP1 Design
<u>ECCSP1</u>	ECC SP1 Adapting to Climate Change

<u>ECCSP2</u>	ECC SP2 Energy and climate change mitigation
<u>ENVDM2</u>	ENV DM2 Pagham Harbour
<u>ENVDM3</u>	ENV DM3 Biodiversity Opportunity Areas
<u>ENVDM5</u>	ENV DM5 Development and biodiversity
<u>ENVSP1</u>	ENV SP1 Natural Environment
<u>HDM2</u>	H DM2 Independent living and care homes
<u>HERDM1</u>	HER DM1 Listed Buildings
<u>HERDM3</u>	HER DM3 Conservation Areas
<u>HERSP1</u>	HER SP1 The Historic Environment
<u>HSP1</u>	HSP1 Housing allocation the housing requirement
<u>QEDM1</u>	QE DM1 Noise Pollution
<u>QESP1</u>	QE SP1 Quality of the Environment
<u>SDSP1</u>	SD SP1 Sustainable Development
<u>SDSP2</u>	SD SP2 Built-up Area Boundary
<u>TSP1</u>	T SP1 Transport and Development
<u>WDM1</u>	W DM1 Water supply and quality
<u>WDM2</u>	W DM2 Flood Risk
<u>WDM3</u>	W DM3 Sustainable Urban Drainage Systems
<u>WMDM1</u>	WM DM1 Waste Management

### **Neighbourhood Plan Policies:**

<u>Bognor Regis Neighbourhood Plan 2015 Policy 1</u>	Delivery of the Vision
<u>Bognor Regis Neighbourhood Plan 2015 Policy 8</u>	Pre-Application Consultation
<u>Bognor Regis Neighbourhood Plan 2015 Policy 8A</u>	Design Excellence
<u>Bognor Regis Neighbourhood Plan 2015 Policy 8B</u>	Car Parking

### **Planning Policy Guidance:**

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

### **Supplementary Guidance:**

SPD11	Arun Parking Standards 2020
SPD13	Arun District Design Guide (SPD) January 2021

## **ADVICE**

### **POLICY CONTEXT / DESIGNATIONS**

The Development Plan consists of the Arun Local Plan 2011 - 2031 (ALP), West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The Bognor Regis Neighbourhood Development Plan (BRNDP) was made on 11 November 2015.

The following policy designations are relevant:

Built Up Area Boundary

Flood Zone 2

Future Flood Zone 3a (2061 onwards)

Adjacent to 'Upper Bognor Road and Mead Land' Conservation Area

Wider setting of Grade II Listed Building

Pagham Harbour Zone B

Economic Growth Area

2km Buffer for Site of Special Scientific Interest

CIL Charging Zone 4

The key Development Plan policies for this proposal are AH SP2 (Affordable Housing), D SP1 (Design), D DM1 (Aspects of Form and Design Quality), D DM2 (Internal Space Standards), D DM4 (Extensions / Alterations to Existing Buildings), ECC SP1 (Adapting to Climate Change), ECC SP2 (Energy and Climate Change Mitigation), ENV DM2 (Pagham Harbour), ENV DM3 (Biodiversity Opportunity Areas), ENV DM5 (Development and Biodiversity), ENV SP1 (Natural Environment), H DM2 (Independent Living and Care Homes), HER DM1 (Listed Buildings), HER DM3 (Conservation Areas), HER SP1 (Historic Environment), H SP1 (Housing Allocation), QE DM1 (Noise Pollution), QE SP1 (Quality of the Environment), SD SP1 (Sustainable Development), SD SP2 (Built-Up Area Boundary), T SP1 (Transport and Development), W DM1 (Water Supply and Quality), W DM2 (Flood Risk), W DM3 (Sustainable Urban Drainage Systems), and WM DM1 (Waste Management) of the Arun Local Plan. Additionally, the Arun Design Guide, and the Arun Parking Standards 2020.

Policies 1 (Delivery of the vision), 8 (Pre-application consultation), 8a (Design Excellence) and 8b (Car Parking) of the BRNDP are relevant.

## PRINCIPLE

The relevant policies are:

- ALP policies SD SP1, SD SP2, H SP1 and H DM2.
- NPPF

Material considerations will include:

- The current Housing Land Supply (HLS) position.
- The council's Action Plan (June 2019).
- The council's Interim Policy Statement for Housing Delivery.

Policy SD SP1 concerns sustainable development and states the Council will take a positive approach to development which reflects the presumption in favour of sustainable development contained in the NPPF. The site benefits from being in the Built-Up Area Boundary in which the principle of residential redevelopment is acceptable. Policy SD SP2 states that development should be focused in the Built-Up Area Boundaries and will be permitted, subject

to consideration of other relevant policies of the within the Local Plan.

Policy H SP1 concerns the Housing Requirement for Arun. The change of use from convent to residential use for 14 units (8 No. Bungalows and 6 No. Flats), would see the sustainable redevelopment of an existing site within the BUAB, which would contribute positively to the HLS position for Arun, in accordance with H SP1. Policy H DM2 states that new independent living and care homes will be permitted where the following can be demonstrated:

- The scheme is located within the BUAB;
- The scheme is easily accessible either by foot or public transport to community and social facilities;
- The design of the scheme shall be such that it can be easily adapted to the varying needs of the users;
- The design and scale is appropriate to the local context;
- Amenity space is provided;
- The scheme is located where it would support and encourage the continuation of a healthy, active lifestyle.

The development would meet all of the above criteria, and as such would be in accordance with H DM2 of the ALP.

The NPPF (paragraph 128) supports the effective and efficient use of land for sites in the built-up area but advises new development should maintain an area's prevailing character and setting (including residential gardens) and secure well-designed, attractive, and healthy places.

Paragraph 11(c) states that development proposals that accord with an up-to-date development plan should be approved without delay. 11(c) is relevant in this case as the proposal falls within the Built Up Area Boundary and will be determined under an active adopted local plan, in accordance with ALP policy SD SP2.

The site is sustainably located, in close proximity to Bognor Regis town centre, and associated public transport routes (such as bus or train). The proposal would be for 14 No. supported living units which would make a positive contribution to the current HLS shortfall and help to meet local housing needs. The need for residential housing for adults with learning difficulties and autism is significant within the District, with written support provided by WSCC Adult Services identifying this fact. This development would therefore be of substantial benefit in supplying this specialist form of supported living facility. The proposal meets the economic, social, and environmental aspects of sustainable development, and as such the principle of this change of use is acceptable.

## AFFORDABLE HOUSING PROVISION

The relevant policies are:

- ALP policy AH SP2
- NPPF

It is understood from the covering letter submitted with this Pre-App application, that confirmation from the Council is requested to confirm whether the proposal would be subject to affordable housing requirements, given the critical nature of the accommodation being

proposed.

In accordance with Policy AH SP2, all developments of 11 residential units or more are required to provide a minimum of 30% of the total units proposed as affordable housing. This is where it cannot be proven that the 30% affordable housing provision is not viable. Of the 14 units proposed, this would require a minimum of 4.2 units be affordable. However, given the speciality of this development, and its significant need within the District, the requirement to comply with AH SP2 should be considered pragmatically. In this instance, we revert back to Para 66 of the NPPF. This states the following:

'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership...Exemptions to this 10% requirement should also be made where the site or proposed development:

- a) provides solely for Build to Rent homes;
- b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);
- c) is proposed to be developed by people who wish to build or commission their own homes; or
- d) is exclusively for affordable housing, a community-led development exception site or a rural exception site.'

As per Para 66 (b), it is considered that the development concerns the creation of specialist accommodation, in this case being a supported living residential use for adults with learning disabilities and autism. This meets the meaning (as interpreted) of specialist accommodation and specific needs, and as such it is considered that the development should be exempt from the requirement to provide affordable housing, in accordance with Part 5, Para 66 (b) of the NPPF.

## DESIGN / VISUAL AMENITY AND CHARACTER

The relevant policies are:

- ALP policies D DM1, D DM4 and D SP1
- BRNDP policy 8a
- National Design Guide
- Arun Design Guide (adopted January 2021); and
- NPPF

Policy D SP1 of the Arun Local Plan requires that development proposals should make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish, and architectural details.

Policy D DM1 of the Arun Local Plan sets out a 15 point criteria against which the design of new development should accord with. Policy D DM4 of the Arun Local Plan provides a 5 point criteria against which development for alterations to existing buildings shall be assessed.

Arun has adopted a Design Guide which provides detailed guidance that will help raise design

standards across the district.

Being a change of use with only minor changes to the internal and external appearance of the property, these alterations are likely to be acceptable with little harm to design and visual amenity. Any changes should ensure they are in keeping with the existing design and materiality of the host building.

The proposal would have some impact on the character of the locality. However this is unlikely to be of sufficient harm to warrant refusal on these grounds. The immediate vicinity abutting the convent to the west is residential, with Butlins to the east. This existing character is therefore a mix of residential and tourism; and as such the introduction of a new residential unit for supported living would be coherent with the general varied character of the area.

Given the minor scale of physical works to the building, and the congruent character with the locality, it is unlikely that the proposal would have adverse harm to the visual amenity or character of the locality. This would be in accord with D DM1 and D SP1 of the Arun Local Plan, Policy 8a of the NRNDP, and the Arun Design Guide.

## RESIDENTIAL AMENITY / QUALITY OF ENVIRONMENT

The relevant policies are:

- ALP policies D DM1, D DM4, QE DM1 and QE SP1
- Arun Design Guide
- NPPF

ALP policy D DM1(3) requires the consideration of impacts of neighbouring amenity such as loss of sunlight, privacy and outlook and unacceptable noise and disturbance. In this instance the primary concern is potential for noise and disturbance, as there will be no change to the structure of the building that would result in a change in existing overbearing, overlooking or overshadowing.

Policy QE SP1 of the Arun Local Plan requires all development to contribute positively to the quality of the environment and ensure that development does not have a significantly negative impact on residential amenity. Policy QE DM1 seeks to protect against the impacts of new noise generating development.

The NPPF requires that decisions should ensure that developments create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

The change of use would have some impact on neighbouring amenity, resultant in a change to the nature and movements of the occupiers and visitors of the property. The proposal would include residential accommodation for 14 unrelated individuals, each needing varying levels of care. This would result in an increase in noise pollution and disturbance from each of the 14 occupiers, visiting carers, and any other visitors such as friends and family. It is unlikely this noise pollution will be detrimental to amenity however, as this noise will generate primarily from those using the garden, and the coming and going of person(s) and vehicles. This noise would be occasional rather than constant, and would be greatest during the day, rather than at night during anti-social hours. Noise at night would be limited. This would result in some minor

disturbance, however it is unlikely to give rise to significant harm to residential amenity.

The proposal is unlikely to result in adverse harm upon neighbouring amenity in compliance with D DM1, D DM4, QE SP1 and QE DM1 of the Arun Local Plan and the Arun Design Guide.

## INTERNAL / EXTERNAL SPACE STANDARDS

The relevant policies are:

- ALP policy D DM2
- Arun Design Guide
- Nationally described space standards

Policy D DM2 of the Arun Local Plan requires internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs. From the plans submitted, it is demonstrated the residential units exceed the criteria set within the Nationally Described Space Standards and thus would accord with Policy D DM2 of the Arun Local Plan.

Part H of the Arun Design Guide provides a guideline that communal shared spaces, such as shared external amenity space, should be at minimum 40m<sup>2</sup>, plus 10m<sup>2</sup> for each unit (a total of 140sqm). This would mean the minimum space provided would need to be 180m<sup>2</sup>. The amenity land to the south of the building has been measured, and approximately 700m<sup>2</sup> of external amenity space would be provided (not including the courtyard to the centre of the building). Subsequently, the site exceeds the requirements of Part H, and would be acceptable.

## HERITAGE ASSETS

The relevant policies are:

- ALP policies HER DM1, HER DM3 and HER SP1
- BRNDP policy 1
- NPPF

The NPPF requires the effect of an application on the significance of a designated or non-designated heritage asset (locally listed buildings) to be taken into account. In weighing applications that directly or indirectly affect heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Policy HER SP1 of the Arun Local Plan states that heritage assets and their settings will need to be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment. Policy HER DM1 concerns listed buildings and requires the following:

- a. Preserve or enhance the historic character, qualities and special interest of the buildings;
- b. Be necessary and not detrimental to the architectural and historical integrity and details of the exterior;
- c. Protect the architectural and historical integrity of the interior;
- d. Protect the special interest of buildings of architectural or historic interest; and

e. Protect, and where possible enhance the setting of the building.

Policy HER DM3 concerns conservation areas and requires applications to preserve or enhance the character or appearance of the area.

BRNDP policy 1 require any major development to identify the significance of any affected heritage assets and assess any harm and benefit.

The proposal would be to the south of a Conservation Area and Grade II Listed Building. Whilst it is anticipated that the change of use would have no adverse harm on these heritage assets, evidence should be provided with any application to identify any potential heritage assets at risk, and demonstrate there will be no harm.

## DRAINAGE AND FLOODING

The relevant policies are:

- ALP policies W SP1, W DM2 and W DM3
- NPPF

The site lies within EA Flood Zone 2, and Future Flood Zone 3a (from 2061), as identified by the Arun Strategic Flood Risk Assessment (SFRA). Para 165 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Policy W DM2 of the Council's Local Plan states that development in areas at risk from flooding, identified on the latest Environment Agency flood risk maps and the SFRA, will only be permitted where all of the following criteria have been satisfied:

- a. The sequential test in accordance with the National Planning Policy Guidance has been met.
- b. A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.
- c. The sustainability benefits to the wider community are clearly identified.
- d. The scheme identifies adaptation and mitigation measures.
- e. Appropriate flood warning and evacuation plans are in place; and
- f. New site drainage systems are designed to take account of events which exceed the normal design standard i.e., consideration of flood flow routing and utilising temporary storage areas

Due to the location of the site within Flood Zone 2, and 3a, a Flood Risk Assessment (FRA) will be required should planning permission be sought. This must address the points as outlined above by policy W DM2. Future flood risk as a result of climate change must be considered as part of this FRA. You should consult the online National Planning Policy Guidance (NPPG) on flooding to ensure that your scheme complies with the guidance and all relevant documentation is submitted with your application. As the application would be for a change of use, it is not necessary that the sequential test is undertaken, nor any sustainability benefits are identified, however a site-specific FRA (or statement) must be provided demonstrating the development would not put lives or property at risk of flooding.



Policy W DM3 states all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS) as appropriate to the size of development.

Being a change of use, it is anticipated that there would be no resultant impact on the drainage strategy for the site. However, it may be beneficial for a statement to be provided demonstrating that the development is able to sufficiently drain.

## HIGHWAYS, TRANSPORT AND PARKING

The relevant policies are:

- ALP policies T SP1
- BRNDP policy 8b
- Arun Parking Standards SPD
- NPPF

Policy T SP1 of the Arun Local Plan requires development to incorporate appropriate levels of parking in line with West Sussex County Council guidance on parking provision, taking into consideration the impact of development upon on-street parking. The Arun Parking Standards SPD sets out parking requirements for developments.

It is understood that the proposal would seek to use the existing access and parking on site (around 10-12 spaces). As the change of use would be Sui-Generis, the Arun Parking Standards does not provide a minimum number of vehicle and cycle parking spaces that must be provided. Rather, parking provision will be determined on a case by case basis on travel plan and needs. At present, from the details submitted it is unclear how many members of staff are proposed on site at any one time, and therefore it cannot at this stage be concluded whether the parking provision on site will be sufficient. This number of spaces, given the location of the site, is likely to be acceptable, however supporting evidence by way of a travel plan / statement should be provided with any application for planning permission, to demonstrate the parking provision is sufficient.

The APS also requires the provision of cycle parking on site, in order to encourage the use of alternative methods of transport. Any details of proposed cycle parking should be provided with any application.

## BIODIVERSITY

The relevant policies are:

- ALP policy ENV SP1 and ENV DM5
- NPPF

Arun Local Plan policy ENV SP1 states Arun District Council encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. The Council will ensure, policy ENV SP1, that the intrinsic features of particular interest are safeguard or enhanced. Policy ENV DM5 states development schemes shall seek to achieve a net gain in biodiversity and protect habitats on

site.

Paragraph 180 of NPPF (2023) requires planning policies and decisions to contribute to and enhance the natural and local environment by: minimising impacts on biodiversity and providing net gains in biodiversity where possible. This paragraph calls for the establishment of coherent ecological networks that are more resilient to current and future pressure.

Biodiversity Net Gain became mandatory for major development from 12 February 2024, requiring that all new developments provide 10% BNG on or off site. This is subject to any exemptions. The proposal would be for a change of use, and as such would be subject to the 'de minimis' exemption, as it would not be affecting more than 25m<sup>2</sup> of onsite habitat, or any priority habitats.

Details of biodiversity on site should be provided with any planning application, in order to comply with policy ENV DM5 of the ALP and demonstrate the ecological value on site will be preserved, and if possible enhanced.

## SUSTAINABLE CONSTRUCTION

The relevant policies are:

- ALP policy ECC SP2

Policy ECC SP2 requires all new residential and commercial development to demonstrate how it will be energy efficient.

To achieve conformity with Policy ECC SP2 a condition would continue to be imposed on any new permission requiring the applicant to detail how the proposal will accord with the above policy. This could be avoided if sufficient information was provided with the application. Subject to the submission of satisfactory details the development would accord with Policy ECC SP2 of the Arun Local Plan.

## WASTE MANAGEMENT

The relevant policies are:

- ALP policy WM DM1

Policy WM DM1 states that new residential development, including conversions, will be permitted provided that:

- a. It is designed to ensure that kerbside collection is possible for municipal waste vehicles
- b. Where appropriate, communal recycling bund and safe bin storage areas are available to residents of flats.

Details of waste management should be provided with any application for planning permission, to identify how refuse and recycling will be organised on site.

## PLANNING OBLIGATIONS

PAGHAM HARBOUR:

The relevant policies are:

- ALP policy ENV DM2

The application site falls within the 5km buffer of the Pagham Harbour Special Protection Area. Within Zone B policy ENV DM2 of the Arun Local Plan requires all new residential development which is likely to have an impact on Pagham Harbour to make developer contributions towards the agreed strategic approach to access management at Pagham Harbour.

A contribution of £950 would be required per new dwelling in this regard. Details of how this can be made are available on the Council website at: <https://www.arun.gov.uk/planning-obligations/>

CIL:

The Community Infrastructure Levy (CIL) is a way of making sure that all relevant development contributes towards new infrastructure such as transport, open space, flood defences, greenspace, leisure centres and schools.

CIL is charged per square metre on new developments, and applies to:

- new dwellings of any size
- any development where the internal area of a new building, extension or change of use exceeds 100 square metres

Community Infrastructure Levy (CIL) rates depend on the size, type, and location of your development. The application site lies within Zone 4. Details of CIL charges can be found here: <https://www.arun.gov.uk/cil-calculate>.

## SUMMARY

Based on the above comments it is concluded that were an application for permission to be submitted for the change of use of the Convent to Residential Use for Adults with Learning Difficulties and Autism, it would likely be approved. This would be subject to additional details in regard to heritage assets, parking, biodiversity, waste management and flooding being acceptable.

## FOLLOW UP MEETING

If you would to request a follow up meeting to discuss this pre-application and advice, we are willing to offer a discussion over the phone for no additional fee. Please forward a request quoting ref PAA/81/24/ in order to arrange a call.

## MAKING AN APPLICATION

If you decide to proceed with making an application you will need to quote this pre application advice reference number PAA/81/24/ 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 need to provide all the plans and supporting information as indicated in the relevant Planning Validation Requirements List on our website:** <https://www.arun.gov.uk/making-a-planning-application#Planningvalidation>

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 or ordinary watercourse consents. 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



Neil Crowther  
Group Head of Planning

# ECE Planning

---

Appendix B - Letter of support from the Market Development Lead  
Commissioner at WSCC

**Carrie Anderson**

Market Development Lead Commissioner  
Adult Services  
Bridge House  
Barrington Road  
Worthing  
West Sussex  
Telephone 0330 222 2996  
Email address  
carrie.anderson@westsussex.gov.uk



Mr André Brümmer  
Slasco Properties  
168 Church Road,  
Hove,  
East Sussex,

18/10/2024

BN3 2DL

Ref: St Juliana Convent, Bognor

Dear Mr Brümmer

Following our initial discussion regarding the proposed redevelopment of Juliana Convent, Marian Way, Bognor Regis, West Sussex, PO21 1PA to a Supported Living Scheme, I can confirm that in principle, WSCC are in support of this development by Slasco Properties Ltd (Company number 15948615).

We discussed the plan to deliver 3 nr. wheelchair accessible bungalows, 5 nr. bungalows and 6 nr. flats plus associated staff space for a cohort with Learning disabilities, mental health needs and Autism.

I can confirm that there is a significant need for all age specialist accommodation in the area for adults aged 18 years plus that require specialist care and accommodation.

WSCC agree to having further conversations with you to continue to explore the feasibility of this project and its ability to meet the Council's strategic goals to provide specialist accommodation for adults who require care and support.

In principle if you deliver the development in partnership with the Council and can deliver the outcomes we have discussed, the Council will work with you as a provider to find appropriate referrals to fill the 14 units and the cost modelling of the service.

As advised any commissioning of services will be subject to the Council's internal governance processes as set out in the Council's Constitution.

I look forward to hearing from you in due course.

Yours sincerely,



Carrie Anderson  
Market Development Lead Commissioner