

From: Amanda Scholes on behalf of Planning.Responses
Sent: 08 June 2020 11:16
To: Planning Scanning
Subject: FW: Application no. BR/86/20/PL Land at Aldwick House, 41-45 Nyewood Lane, Bognor Regis, West Sussex PO21 2SJ
Attachments: G292-FN01 - Response to Comments.pdf
Importance: High

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Save the environment - think before you print.

From: James Cross <James.Cross@arun.gov.uk>
Sent: 05 June 2020 13:50
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Application no. BR/86/20/PL Land at Aldwick House, 41-45 Nyewood Lane, Bognor Regis, West Sussex PO21 2SJ
Importance: High

Hi Planning Responses,

Could the below email response and attachment be uploaded to the above application file please?

Kindest regards,

James Cross Bsc (Hons) MSc Logi TP. MTPI
Strategic Development Sites Project Officer

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From: Tim North & Associates [REDACTED]
Sent: 03 June 2020 16:37
To: James Cross <James.Cross@arun.gov.uk>
Cc: 'Jamie Copland' [REDACTED]; 'Jim Denney' [REDACTED] 'David Englehart' [REDACTED]
'Caroline Mumford' [REDACTED] 'Tom Peters' [REDACTED]
Subject: Application no. BR/86/20/PL Land at Aldwick House, 41-45 Nyewood Lane, Bognor Regis, West Sussex PO21 2SJ
Importance: High

Dear James

I have noted that there have been no objections from Sussex Police in terms of the use of this site, as well as from the County Engineer in two separate responses where it concerns parking and traffic related issues; your drainage engineer; your conservation officer and Historic England concerning the above mentioned application. I have enclosed with this e-mail a Technical Note prepared by my client's highway consultants, PFA Consulting, as part of a response to observations raised by local residents which are primarily concerned with parking issues.

You will note from the Technical Note under the title "3. Parking Demand" that in calculating a comparison of existing similar types of site, and from the 2011 Census data for the Middle Super Output Area in which the site is located that my client's highway consultants have calculated that car ownership levels per dwelling are between 45-55%, and therefore based on the proposed development the likely parking demand is between 17-20 vehicles. In applying these percentage to the possible occupants of the 38 bedsit units, as opposed to the number of dwellings, this would increase likely parking demand to 23-29 vehicles; all of which could still be accommodated within on-street parking within 200m of the application site. This represents 25% of all available spaces according to the survey material.

There has been no criticism, understandably so, from local residents of the veracity of the survey material on which the Transport Statement has been prepared. No equivalent car parking survey has been prepared which contradicts the conclusions drawn from the transport statement. The car ownership levels per dwelling of 45-55% are directly comparable with what is stated in paragraphs 3.79 and 5.01 of the planning statement, namely that on average, only 50% of the occupants of the bedsit accommodation in other developments managed by my clients have access to a private car, reinforcing if necessary the case on the likely parking demand figures set out in the accompanying Technical Note.

There are two other matters which need to be considered in this regard.

Firstly the site enjoys a lawful Class C2 use as a 32-bed nursing home. The Schedule of registered HMOs within 200m of Aldwick House is set out at Table 2 of the planning statement on page 30. There is no loss of any residential unit whether or not capable of family occupation. The previous lawful use of the site employed approximately 40 members of staff, 25 of whom were full time, deployed on a 24-hour 7-day a week rota basis. No restrictions were imposed on visiting times, when family members and friends visited occupants of the nursing home, with the intensity of the use increased through attendance on a regular basis of doctors, nurses, hairdressers, chiropodists and garden contractors. This information is provided at paragraph 3.39 of the planning statement. These factors are required to be compared with the proposed development involving the employment of a weekly cleaner, a monthly window cleaner and a gardener for regular maintenance purposes. It is important that these factors are taken into account when considering parking and traffic related issues when comparing the proposed development with the lawful use of the site, particularly from a parking and traffic related perspective

Secondly, access by emergency vehicles along surrounding streets and the presence of on-street car parking is not a new phenomenon given that on-street car parking is already prevalent in the locality and will continue to be so.

Thirdly, visibility into and out of some highways has been cited as an issue due to on-street parking. This is already a current practice and is not a matter raised by the County Council as highway authority.

Lastly, it is regrettable that pre-conceived notions have arisen regarding the proposed HMO accommodation which is precisely the reason why offers have been made to yourself and Members to visit equivalent establishments managed by my clients, so that they can see for themselves the highly professional management of the same facility. As indicated in Table 5 on page 58 of the planning statement, a mix of tenants of different ages is prevalent in similar related establishments organised by my clients. I have received no response to the invitation to visit other premises managed by my clients from any Councillor or third party. This is an important consideration when considering the weight to be attached to objections raised by third parties to the current application.

I should be grateful if the matters set out in this e-mail along with those in the accompanying Technical Note prepared by PFA Consulting Ltd could be brought to the attention of Members of your Planning Committee and/or set out in your report.

Meanwhile if there is any further information with which I can assist, please do not hesitate to contact me.

Kind regards

Tim North

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Managing Director

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Aldwick House, 41-45 Nyewood Lane, Bognor Regis

Response to Objections Received Against application BR/86/20/PL

1. Introduction

- 1.1. The above application was submitted for the change of use for a 32-bed nursing home (C2 Residential Institution) to a 38 bedsit House in Multiple Occupation, comprising 24 single rooms and 14 two person rooms.
- 1.2. Following the submission of this application several comments were made on transport and parking grounds. The key transport relevant themes resulting from these comments were:
 - The availability of parking within the local area;
 - The likely demand for parking;
 - Trips will be made by vehicles not walking and cycling;

2. Car Parking Availability

- 2.1. A large proportion of the comments received centred on the availability, or lack of, car parking within the local area. Particular reference was made to Wood Street, located opposite the site, with it noted that Wood Street has little to no parking availability.
- 2.2. A parking beat survey was undertaken on two nights (as parking demand is greatest overnight) by an independent company using the industry standard Lambeth Methodology. This survey was to determine the availability of car parking at locations within a 200m radius of the site; all information provided by the survey company has been included within Appendix C of the Transport Assessment which accompanied the application. This report highlighted that, whilst on Wood Street there was only 2.5% capacity, on Richmond Avenue and Nyewood Lane, the two roads that the site is located on/adjacent to, had a capacity of 25% and 27.5% respectively. This equated to 24 spaces located on these two roads alone. In addition to these two roads, there are a number of other residential streets within 200m which allow for on street parking, of which there were 116 spaces available, representing 30.3% of the total on-street parking capacity in the area.
- 2.3. The West Sussex County Council Consultation agreed with the above methodology and the notion that within the surrounding residential streets there was sufficient demand to handle the additional parking demand.

3. Parking Demand

- 3.1. Several comments raise the likely parking demand of the site as a reason for objection, stating that the suggested parking demand of 17-21 cars did not represent the worst case. This was calculated from a comparison of existing similar type sites and 2011 census data for the Middle Super Output Area within which the site is located. These produced car ownership levels per dwelling of between 45-55%, therefore based on a car ownership of 45-55% of the proposed 38 dwellings, the likely parking demand is between 17-21 vehicles. Were these percentages applied to the possible occupants of the 38 dwellings, rather than the number of dwellings, this would increase the likely demand to 23-29 vehicles, all of which could still be accommodated within on street parking within 200m of the site, representing 25% of all available spaces, according to the survey detailed above.

3.2. Trips by Walking and Cycling;

- 3.3. The final transport related theme of the comments was that it was unrealistic to expect people to travel by walking and cycling. This is considered unreasonable given the site's location and characteristics. The site is well located for sustainability, located within an urban area 1.5km away from the substantial town centre, and has access to 1.5m wide footways in all directions. There is also a traffic free cycle route along the Promenade, approximately 300m to the south of the site, which can be used to access a range of facilities and employment within the town centre.
- 3.4. In addition the site will be required to ensure that there are 40 cycle parking spaces provided prior to the development opening, therefore all dwellings will have at least one cycle parking space, thus promoting cycling as a viable transport option. These factors mean that walking and cycling are likely to be the main modes of transport for the site's residents, given the low cost, ease of travel and close proximity of key destinations.

4. Conclusion

- 4.1. The above addresses the key comments raised through the public consultation process. It confirms that there is currently additional on-street parking capacity on neighbouring streets; that there is capacity across these streets for the additional parking demand; and that the site will give rise to limited vehicular movements in any case due to its sustainable location with good walking and cycling connections to the town centre and other key destinations. This stance was shared by West Sussex County Council in their role as the local highway authority, who stated that they "do not consider the application to cause any highway safety or capacity issues" and "as such no objection is raised".