
Sussex Building Consultancy Limited



Planning Statement for Change of Use from Guest House to a Building with 4 x self-contained apartments.

**Jubilee Guest House, 5 Gloucester Road,
Bognor Regis, PO21 1NU.**

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1.0 Introduction

- 1.1 The application is for a planning application for change of use of the existing guest house into a unit containing 4 x self-contained apartments.
- 1.2 The existing site of 5 Gloucester Road is a property with rooms available for let for short term holiday use but has also been available to the authorities to use for emergency accommodation for vulnerable persons or families.
- 1.3 Since the guest house use, the owner has carried out some adaptations to the layout and accommodation to reflect the changing demand, however, these remain largely unfinished.
- 1.4 The owner now seeks formal approval for the apartments to seek a more economically viable use as trade is not at levels previously experienced.



Picture – Front street elevation.

2.0 Site Description

- 2.1 The building in question, is a large two-storey Edwardian residential style building facing the Butlins Holiday resort in the eastern side of Bognor Regis.
- 2.2 The building sits on a rectangular plot fronting Gloucester Road and is part of a small row of similar properties.
- 2.3 To the front there is a small garden area currently used for off street parking for the owner and a side passageway leads to an enclosed rear garden with a small shed and access to the rear ground floor unit.
- 2.4 The local area is characterised by detached, semi-detached and terraced dwellings of varying sizes and designs, some used as guest house accommodation and others sub-divided into flats.

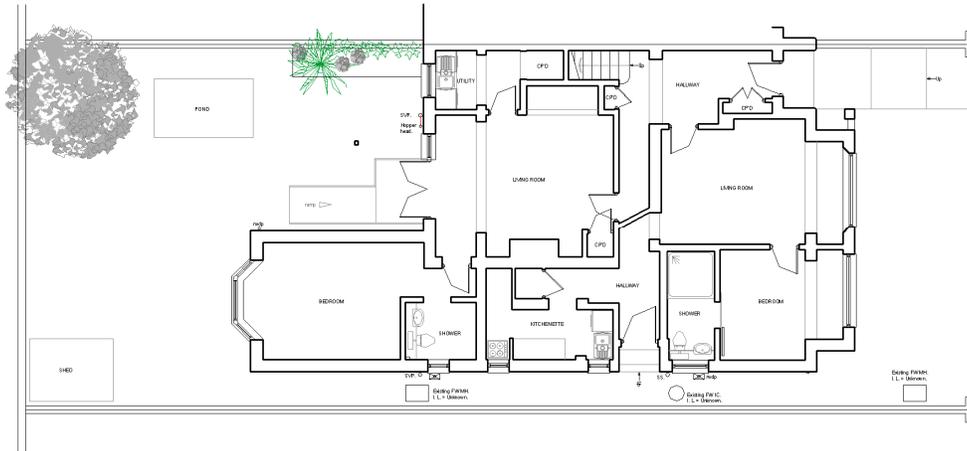


Photo – View from the street.



Photo – The rear walled garden.

2.5 The existing property is not Listed, nor is it within a Conservation Area.



Picture – Existing Plot Plan.

3.0 Planning History.

3.1 The relevant planning history is shown below.

PRE- 1986

BR/197/55 5 Gloucester Road Bognor Regis Proposed use of vacant house as day school for boys
Planning – Refuse.

BR/197/55/A/B5 Gloucester Road Bognor Regis Internal alterations & improvements to existing flats
Building – Permitted.

BR/236/77 5 Gloucester Road Bognor Regis Change of use from private house to guest house
Planning - Approve Cond.

BR/372/77/B 5 Gloucester Road Bognor Regis Alterations for change of use as guest house
Building - Permitted.

BR/97/82 Jubilee Guest House 5 Gloucester Road Bognor Regis Change of use from guest
house to rest home. Planning - Approve Cond.

POST 1986

BR/515/88 Jubilee Guest House Gloucester Road Bognor Regis - Extension to provide staff
accommodation. Planning – Approved Conditionally.

- 3.2 Originally built as a single family dwelling, it is not known when it was converted into flats.
- 3.3 As can be seen from the planning history above, permission was gained in 1977 to convert the building from flats into a guest house use.
- 3.4 Before the current internal works were commenced, the guest house had six rooms for let, four of the bedrooms had en-suite facilities. Separate shower and WC were available to users of the other two rooms. In addition to this there was owner's accommodation with a lounge, kitchen, bedroom with en-suite facilities and an office – this is thought to be what is currently shown as Unit 3 on the first floor.

4.0 Planning Policy

A. National Policy Context

- 4.1 The National Planning Policy Framework (NPPF) was published in July 2018, with some minor amendments in February 2019, at which time the policies in the Framework came into use, with immediate effect. This guidance is now the most-up-to date Government Guidance and replaces all planning policy statements/guidance that were previously in place.
- 4.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.3 The focus of the revised NPPF continues to be achieving sustainable development. The NPPF clarifies that *“at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs” (taken from Resolution 42/187 of the United Nations). However, at paragraph 8 the Framework sets out that in planning terms, and in order to achieve sustainable development there are “three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”*. These objectives are economic, social and environmental, which *“should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”* (paragraph 9)
- 4.4 Paragraph 8 cites the economic objective as helping to *“build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*.
- 4.5 Paragraph 11 is an important element of the NPPF. It states that: *“Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking*

this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*

- 4.6 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”*
- 4.7 Section 4 of the Plan refers to Decision Making. At paragraph 38 of the Framework, it sets out that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should... work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.*
- 4.8 Section 6 relates to building a strong, competitive economy. It notes at paragraph 80 that *“planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”.*
- 4.10 Paragraph 84 notes that *“planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.*
- 4.11 Section 9 discusses sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles.
- 4.12 Paragraph 105 sets out that *“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling*

justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.”

- 4.13 Paragraph 108 confirms that the main considerations in transport terms when determining specific planning applications is that proposals should provide: *“a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; and c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*.
- 4.14 At paragraph 109 the Framework also confirms 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.”*
- 4.15 Section 12 refers to achieving good design. Paragraph 124 states *“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development...”*
- 4.16 Paragraph 127 sets out that “decisions should ensure that developments:
- a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f. 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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
- 4.17 Paragraph 130 confirms that *“where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development,”* whilst paragraph 131 sets out that *“in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of*

design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

- 4.18 Further parts of the Framework that are of particular note include Section 15, which refers to the desire for development to contribute to and enhance the natural and local environment.

The Arun Local Plan 2011 – 2031

- 4.21 The Arun Local Plan 2011 – 2031 was adopted by resolution of Full Council on 18th July 2018. It comprises a written statement and supporting policy maps 1-4. The plan sets out a spatial vision, objectives and a sustainable strategy for delivering the needed growth of the District over the period 2011 – 2031. This plan replaces the Arun Local Plan 2003 and the saved policies within it and now provides the most up-to-date policy guidance for the District.
- 4.22 The Application Site is located within the defined built up area boundary, where in accordance with **Policy SD SP2** (Built up Area Boundary), development should be focused, subject to consideration against other policies of the Local Plan.
- 4.23 The following policies are considered to be of relevance to this proposal:-
- 4.24 **Policy SD SP1** is a general policy, which relates to Sustainable development. It states that *“when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland). This presumption will not be applicable where development requires an Appropriate Assessment or where consideration of the need for one is being undertaken”*.
- 4.25 **Policies H SP1** and **H DM1** are general policies, which relate to The Housing Requirement and Housing Mix respectively. The District is required to provide at least 20,000 new homes over the plan period (up to 2031). This requirement is to be met by a number of strategic allocations as set out in the Local Plan, windfalls, and additional non-strategic allocations that will be made across the District through emerging Neighbourhood Plans and the production of a subsequent Non-Strategic Site Allocations Development Plan Document (DPD). The supporting text to **Policy H DM1** confirms that *“requirements vary across the District and factors such as proximity to public transport and services, place and site characteristics will determine what is a suitable dwelling mix at any particular location... The Council is keen to promote growth and deliver development that reflects the demand and profile of households in the District”*.
- 4.26 **Policy G1 SP1** is a general policy, which relates to Green Infrastructure and development.

4.27 **Policy D SP1** refers to Design. It states that *“all development proposals should seek to 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. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development. With major developments (as defined in the GDPO 1995 (as amended(41)) or allocated sites in the Development Plan. In addition to a Design and Access Statement, a context appraisal, context plan and analysis of the site will also be required”*.

4.28 **Policy D DM1** relates to aspects of form and design quality. It states that *“when considering any application for development the Council will have regard to the following aspects:*

1. Character. Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.

2. Appearance/attractiveness. Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.

3. Impact. Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.

4. Innovation. Raise standards of design by embracing appropriate innovative design, new technologies and construction techniques, where a development proposal has the potential to do so.

5. Adaptability. Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.

6. Crime prevention. Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating buildings and play areas along public routes and spaces, and making a clear division between private and public land to foster a mutual protection through territorial belonging. With respect to crime prevention, regard shall be had in particular to the document 'Secured by Design' and the 'Safer Places - The Planning System and Crime Prevention'.

7. Trees and woodland. All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.

8. Solar gain. Within the constraints of the site and local context development proposals should, maximise sunlight and passive solar energy. Ideally development

should be positioned (within a 15-20 degree margin) broadly south, with streets having an east-west pattern.

9. Public realm. Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.

10. Layout - movement Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open spaces, facilities and public transport. Development schemes should carefully consider walking and cycling as an integral part of the overall design concept.

11. Layout – legibility. Deliver or contribute to the ease of navigation within a new or existing development scheme through use of focal points (landmarks, gateways, vistas, corner buildings, active edges, existing topography), and/or a variety of detail within the public realm (sculpture, planting, street furniture, building materials, building detail, signage).

12. Public art. Public Art should be incorporated into schemes where there is capacity to do so. Public art can encompass a wide variety of elements to include art as part of the design of buildings and developments, landscape and planting, street furniture, signage and lighting in the public realm which is accessible to all. This can also result in physical, permanent artworks and sculptures.

13. Density. The density of new housing will make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. Proposals should take into account the density of the site and its surroundings. The density of large sites should be varied to guard against uniformity.

14. Scale. The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement.

15. Aspects of form and design quality. Development should also comply with the Arun District Council Design Guide”.

- 4.29 **Policy D DM2** relates to the Council internal space standards. The planning authority will require internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs.
- 4.30 **Policy OSR DM1** relates to Open space and recreation. It notes that local green space and neighbourhood plan local green space is *“not identified in this Local Plan but will be designated in Neighbourhood Plans in circumstances where the criteria in paragraphs 99 and 100 of the National Planning Policy Framework (49) are met”*.
- 4.31 **Policy ENV DM4** is a detailed policy, referring to the protection of trees.
- 4.32 Finally, **Policy T SP1** is a more general policy that refers to matters relating to transport and development.

5.0 Design Proposal.

- 5.1 The proposal is to seek change of use approval from the guest house use, to a building containing 4 x self-contained apartments.
- 5.2 There are no proposed physical changes externally to the building save for some minor fenestration changes at ground floor level to the side elevation and internal changes are minimal to subdivide for the apartments and as such retains the established residential character of both the property and the locality.
- 5.3 The proposal, therefore, will not have an adverse impact in terms of impact to visual amenity and character of the area and as such the proposal is deemed in compliance with Policy D DM1(1) of the Arun Local Plan.
- 5.4 The new development will not result in any additional overlooking or loss of privacy to adjoining properties.

6.0 Use

- 6.1 The change of use into C3 Residential use creates 2 x 1-Bed apartments and 2 x 2-Bed apartments.
- 6.2 The previous use is classed as guest house (hotel) use – C1.

7.0 Amount

- 7.1 There is no additional floor space created by the development. In total there is 235 m² in floor area, 116 m² on the ground floor and 119 m² on the first floor. Proposed apartment and room sizes are as follows: -

Unit 1.

| | | |
|-------------------------|---|---------------------------|
| Living Room | - | 17.5 m ² |
| Kitchen | - | 9.5 m ² |
| Bedroom | - | 10.5 m ² |
| Total Floor Area | - | 48.1 m² |

Unit 2.

| | | |
|-------------------------|---|---------------------------|
| Living Room | - | 21.1 m ² |
| Kitchen | - | 5.6 m ² |
| Bedroom | - | 16.4 m ² |
| Total Floor Area | - | 48.2 m² |

Unit 3.

| | | |
|-------------|---|---------------------|
| Living Room | - | 17.4 m ² |
|-------------|---|---------------------|

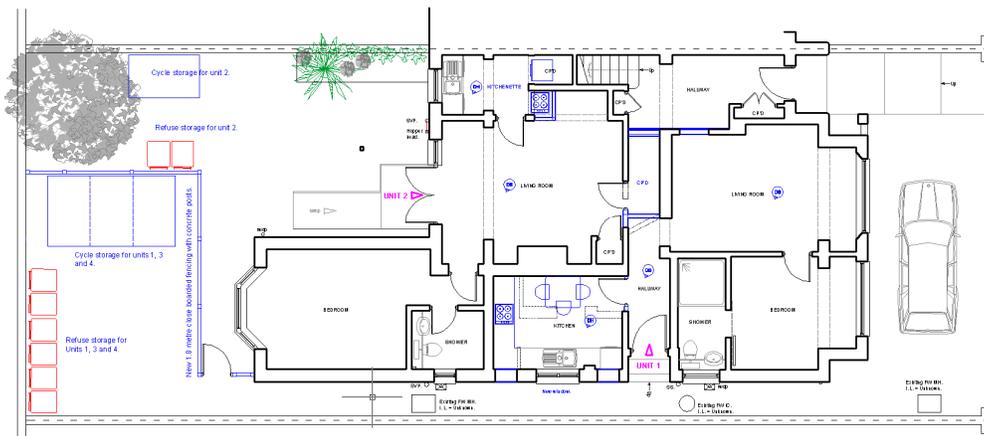
| | | |
|-------------------------|---|---------------------------|
| Kitchen | - | 4.9 m ² |
| Bedroom 1 | - | 13.1 m ² |
| Bedroom 2 | - | 7.8 m ² |
| Total Floor Area | - | 50.4 m² |

Unit 4.

| | | |
|-------------------------|---|---------------------------|
| Living Room | - | 18.2 m ² |
| Kitchen | - | 8.3 m ² |
| Bedroom 1 | - | 10.4 m ² |
| Bedroom 2 | - | 7.0 m ² |
| Total Floor Area | - | 58.4 m² |

8.0 Site Layout

- 8.1 The existing annexe sits on the rectangular plot adjoining No. 7 Gloucester Road.
- 8.2 The layout is generally unchanged from that which exists, save for the subdivision of the rear garden to provide for cycle storage sheds and refuse bin areas for the apartments and some private amenity space for the rear ground floor Unit No. 2.



Picture – Proposed Plot Plan.

9.0 Scale

- 9.1 The scale of the proposed building housing the apartments is considered appropriate to the surroundings, with the building remaining (externally) exactly as it is.
- 9.2 The ridge height measures 8.5 metres above surrounding ground level, which compares favourably with the height of the existing buildings nearby.

10.0 Landscaping

- 10.1 There are no particular changes proposed for the landscaping of the site. There is an existing rear paved amenity area to the rear of the building which is to be subdivided to allow for the proposed cycle storage and refuse bin areas as well as some private amenity area for Unit 2.
- 10.2 The wooden fence screening/subdivision of the garden area is to be close boarded type with concrete posts at 1.8 metres in height.

11.0 Trees

- 11.1 There are no trees impacted by the change of use, the only tree on site is a Pittosporum in the corner of the rear garden which is to remain.

12.0 Appearance

- 12.1 The appearance of the proposed building for 4 x apartments is unchanged by this proposal other than some minor fenestration changes on the side elevation at ground floor level to facilitate the new layout.
- 12.2 The attractive Edwardian appearance of the building is retained and contributes to the character of the local area.

13.0 Materials

- 13.1 The existing building has a painted textured render finish walls with a decorative brick modillion feature.
- 13.2 The pitched roof has profiled interlocking concrete tiles.
- 13.3 Windows and doors are white PVC framed double glazed units.

14.0 Access

- 14.1 The existing vehicular and pedestrian access that serves the building will be retained. There is a space to the front of the building for 1 x vehicle which has been used by the owner of the building and is to be offered to one of the apartments.
- 14.2 Existing pedestrian access remains unchanged with the ground floor units accessed via the side and rear walkway. The first-floor apartments are accessed of the front ground floor entrance hallway and internal stairway.
- 14.3 Off-street parking is available opposite and to adjacent streets with a permit available from the local authority. Permits required between 8.00 am – 6.00 pm.
- 14.4 Additional parking is available in the large public car park opposite and along the Esplanade with payment between core hours.
- 14.5 The site is very close to Bognor Regis town centre and all the amenities that offers, likewise bus routes pass the building and the mainline train station in Bognor Regis approximately 10 minutes away by foot.
- 14.6 It is thought that the site is therefore considered to be sustainably located and not required to follow off-street vehicle space requirements.

15.0 Sustainability

- 15.1 Very little physical changes are proposed to the property so there will be minimal impact on sustainability grounds, indeed, the proposal will make efficient use of the facility.
- 15.2 The property is very close to the beach and whilst there is no amenity space for two of the units, the proximity to the beach allows for easy access to the public facility for all users of the apartments.
- 15.3 The property is also very close to the town centre, local amenities and transport (bus and train) links.
- 15.4 All apartments will have separate secure cycle storage and refuse storage.

16.0 Flood Risk

- 16.1 See separate Flood Risk Assessment.

17.0 Drainage

- 17.1 See separate drainage statement.

18.0 Conclusion

- 18.1 The development proposed is in accordance with Council Local Plan since it meets the criteria and guidelines set out in those policies. The development is located within the built-up area, it does not give rise to any impact on the street scene, nor affect the amenity of surrounding occupiers. The design is sympathetic to its location and good separation distances are maintained to the sides and rear.
- 18.2 Whilst it is accepted that there will be a change in the nature of the property with, any noise pollution increase would be minimal as a result.
- 18.3 The application site is located within a sustainable area, within easy reach of a host of services and facilities close by in both with Felpham Village and Bognor Regis Town Centre and it will make a positive contribution to the vitality of the area.
- 18.4 The existing building is not Listed and nor is it located within a Conservation Area, there is no change to the visual appearance of the building, save for minor fenestration changes.
- 18.5 It is our view that the proposal would represent an acceptable form of development and would not cause demonstrable harm to the residential amenities of any neighbouring property by way of overbearing effect, loss of privacy or loss of light.
- 18.6 Private amenity space, apart from Unit 2 is limited, however, the proximity to the beach allows for easy access to the public facility.
- 18.7 The proposal will provide a high quality, sustainable development and would appear wholly in keeping with neighbouring area and would not detract from the established character and appearance of the surrounding area, nor cause demonstrable harm to the residential amenities of any neighbouring property. The proposal would accord with the aims and objectives of national, regional and local policy and guidance, the application site is a suitable location for housing and permission should be granted.