

Planning Administration
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

10 August 2012
Ref CRB/LT/P1027

To Whom it May Concern

Re; Proposed Application for change of use and alterations from Offices (B1) to Residential (C3) at 35 Worthing Road, East Preston, BN16 1BQ. Planning Portal Reference; PP-02067369.

This letter provides the Planning Statement and Design and Access Statement, necessary to support this application for a Change of Use from office to residential (2 x 2 bedroom flats) at 35 Worthing Road, East Preston.

The application also comprises the following;

- Application Fee £670 (cheque sent under separate cover)
- Planning Application Forms
- Drawings; 5835-Location Plan, Sk01 Site Layout and Sk02 Floor plans, SK03 Elevations, SK04, SK05 and Existing Floor Plans.

Introduction

Registered charity, ICIS, has occupied the property since 1994, having purchased it a year previously from a local surgery and converted the interior into appropriate office space.

ICIS is a well-established, trusted charity that has been supporting individuals in the Arun District and West Sussex since 1994. When people need help in their daily lives because of a disability or disadvantage, ICIS puts them in touch with a comprehensive range of services offering support, advice, social contact and other opportunities.

A long-running core contract with West Sussex County Council was terminated in April 2012. This has created a very significant gap in funding which needs to be filled. ICIS are now using their reserves to fund the continuation of their work. The urgent release of the capital in the property is essential to enable the Charity to continue their work whilst endeavouring to generate income and develop new services to create a sustainable future for the charity. ICIS intend to re-locate to smaller offices nearby, and within the Littlehampton to Worthing corridor.

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The Trustees have a duty to ensure that maximum value is achieved for their property. ICIS have taken professional advice and been advised that a change of use to residential will increase the marketability of the property, which will be discussed in detail below.

ICIS have a small team of 5 full time equivalent staff, and a team of 7 dedicated volunteers from Goring, East Preston, Angmering and Littlehampton, some of whom have supported ICIS for many years. ICIS is well used by residents in the county, as well as voluntary agencies and health and social care professionals, many of whom say they 'cannot do their jobs without us'. ICIS help around 2,000 people, face-to-face, who contact our Enquiry Service each year. ICIS provide online directories of services for the public, and for local and county voluntary organisations, and these directories are searched many thousands of times by people looking for help in their community.

Following a significant cut in funding from West Sussex County Council ICIS now find that the property is too big for their purposes and unviable to retain. As a charity they have a duty to manage their funds appropriately and therefore must release the value in the property in order to help sustain their activities while seeking new sources of income.

Support for the Charity is widespread and Councillor Peter Evans has written in support of the proposed application; (email dated 1 August 2012)

To whom it may concern.

I have known the ICIS organisation since 2005 when I was first elected to represent East Preston at West Sussex County Council, both in my interaction with the organisation as Older Peoples Champion and latterly as Cabinet Member for Children and Families.

ICIS are a registered charity that works to the good of residents throughout Arun District and the wider County, they as many charities need to react to the reduction in funding that they have experienced from Local Authorities and one way is to maximise the value of their capital holdings.

An application to change the use of their present office accommodation to that of residential will allow them to attain that goal. I understand that ICIS wish to continue to support the community ongoing with their excellent work.

I fully support this initiative and would question the need for a contribution to the community by way of a Section 106 agreement, when their sole purpose is to support the very same community.

I would therefore endorse the change of use and support the set aside of the Section 106 contribution as reasoned above.

***Mr Peter Evans FRSA
Member for East Preston with Kingston and Ferring.
Cabinet Member for Children and Families
West Sussex County Council.***

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Site Description and Physical Considerations

The property is a single storey building with a pitched roof, fronting the highway, with car parking to the west, providing for approximately 6 cars.



The building has an asymmetrical pitched roof and is bounded by 2m closeboard fencing to the north, east and western boundaries.



The area is predominantly residential in status, with residential properties located to the north, east and west of the site and south of the Worthing Road.

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View towards the building from the west



Site located to west of dark closeboard fence

The site is located within 75m of well serviced bus stops, surrounding the local area and within walking distance of Angmering Train Station. The nearest shops and services are also within walking distance, approximately 400m from the site.

Planning Policy Considerations

This Full planning application seeks consent for the change of use from offices (B1) to residential (C3) in the form of 2 x 2 bedroom flats.

Such a conversion would under the provisions of Supplementary Planning Guidance require commuted payments of £16,308 toward off site Affordable Housing provision in the District. Such a payment is not however considered to be viable for the Charity as discussed later in this document.

The site is located within the East Preston Built up Area Boundary and as such Policy GEN 2 applies; *Development will be permitted within the built-up area boundaries, subject to the other policies in this plan.*

Policy GEN 5 relates to the provision of new residential development in the District. It has been clearly demonstrated that Arun District have a housing land supply issue in the next 5 years and therefore windfall development sites such as this, will help to meet the defined need for further housing in the District.

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Policy GEN 7 provides a wide range of guidance on the form of new development in the District. It is considered that the proposal will meet each of the relevant policy criteria, providing for an efficient use of a site, which has no adverse impact on amenity, providing for the necessary on site facilities required.

On site parking provision on site will be 2 cars for each flat, providing for a maximum off street provision, consistent with the aims of Policy GEN12.

The existing use is considered to be discordant in relation to the predominance of surrounding residential development and indeed a reduction in the intensity of use would have a positive impact on the amenities of local residents.

The loss of office space in this area is considered to have no adverse impact on the vitality of the local economy with a plethora of alternative more suitably located offices in the local area. Alternative commercial uses are also considered inappropriate in this residential area. The development is considered to be fully consistent with aims of Local Plan Policy.

The National Planning Policy Framework has now replaced all Planning Policy Statements and Planning Policy Guidance Notes providing an all-encompassing document against which to assess the impact of new development.

The NPPF is now a material consideration in the determination of planning applications. The relevant parts of the NPPF relate to transport, housing supply, design and sustainability. The proposal is considered to provide a sustainable and high quality design solution that will provide for a defined need for housing within the locality.

Firstly, the NPPF places a presumption in favour of sustainable development that is the basis of every plan, and every decision. The proposal is not considered to represent unsustainable development and will result in the provision of a highly sustainable development without harm to the character of the locality or amenity of neighbouring residents. Therefore a presumption in favour or approval should exist.

Furthermore, It is clear within the National Planning Policy Framework (NPPF) that viability and deliverability are key determining factors in the decision making process. Paragraph 173 states clearly;

Ensuring viability and deliverability. Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

It is therefore clear that deliverability and viability are key issues to be addressed by the planning system in providing new homes and employment opportunities.

The form of the proposed development and lack of affordable housing contributions proposed are justified by a clear argument that underpins the financial unviability of the project if such policy burdens are placed upon it. The clear positive merits of delivering the scheme should outweigh the requirement for such threatening financial burdens and should be permitted.

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This report will consider fully the financial viability issues associated with the developments as permitted and proposed in relation to current market conditions to justify fully the lack of Affordable Housing Contributions.

Viability Assessment

The main issues for ICIS are achieving both Best Value in capital return terms as well as sale of the site as soon as practicably possible.

The commercial property market is not strong at present and arguably the residential market is only marginally better. By being able to offer the property with both its existing commercial use to owner occupiers/investors and secondly with the benefit of planning to developers looking to convert to residential the greatest possible options are available for disposal in this market.

The existing site has been valued independently by Fludes Commercial who consider the property has a Freehold Sale Value of between **£190,000-£205,000**. With the benefit of consent for 2 x 2 bedroom flats the site value has been estimated at between **£200,000-225,000**. (See attached correspondence)

The development has been costed fully by a team of consultants that have analysed the project in detail to provide the following costings.

Northgates Cost Plan (August 2012)

Fludes Commercial Valuations (August 2012)

The following costings are based on the above documents and standard assumed rates for borrowing, professional fees, legal fees and marketing fees as set out below. The rates are considered to be at the low end of the spectrum to present an entirely reasonable case.

Professional Fees; Architects, Planners, Quantity Surveyors, Engineers, Project Management, CDMC etc.

6%.

Legal Fees; Site Purchase, Build Contracts, Sale/Lease Agreements. 3%

Marketing Costs; Sale/Lease of Residential/Commercial space; 1%

The Northgates Cost Plan was based on the planning drawings prepared by ECE Architects and pays due attention to the sites location and likely standard of build.

Proposed Development Appraisal

<u>Total Residential Sale Value;</u>	£350,000
Build Costs; Northgates	£150,000
Professional Fees(6%);	£9,000
Legal Fees (3%);	£4,500
Marketing Fees (1%);	£1,500
Total Costs;	£165,000
Total Difference	£185,000
<u>Estimated Site Value</u>	<u>£148,000 (assuming 20% profit)</u>

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Proposed Development Appraisal (Value Engineered)

Total Residential Sale Value;	£350,000
Build Costs; VE (-20%)	£120,000
Professional Fees(6%);	£7,200
Legal Fees (3%);	£3,600
Marketing Fees (1%);	£1,200
Total Costs;	£132,000
Total Difference	£218,000
Estimated Site Value	£174,400 (assuming 20% profit)
Estimated Site Value	£196,200 (assuming 10% profit)

On the basis of these simple valuation exercises it is clear that the value of the site for residential purposes is likely to be similar or lower than the offer received for the commercial floor space.

This residential value does not however account for the potential requirement for a further £16,308 of Contributions suggested by ADC toward Affordable Housing provision. Such a requirement would significantly affect the proposed site value by nearly 10%, which would reduce the value to under £158,000, which would be untenable for the Charity.

The Charity need to dispose of the property as quickly as possible at the greatest possible value and would seek to market the property as existing and with the benefit of a potential consent for 2 x 2 bedroom flats.

Whilst it appears that the greatest value may be in retaining the existing commercial use it is hoped that a residential consent may generate a quicker sale and that a speculative builder may be able to cost the works lower than our costings and accept lower profits to achieve a higher site value, closer to the value considered by Fludes Commercial as achievable. (see 10% figure above)

Clearly the potential S.106 payments would have a significant and damaging impact on the viability of the project and the future of ICIS.

It is therefore considered entirely reasonable in this case to remove such requirements to facilitate the continued operation of ICIS in the future.

Design and Access Statement Requirements**Use, Amount and Site Layout**

The proposal involves the change of use of an existing office building of 170sqm to form 2 x 2 bedroom flats at ground floor level only.

The building will be divided along the central spine wall, providing for a 90sqm flat to the rear and a 70sqm flat to the front of the building.

The front flat is accessed via the existing entrance to the building, facing Worthing Road. The internal layout provides for 2 bedrooms, (1 en-suite) a separate bathroom and living/dining and kitchen open plan area.

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The rear flat is accessed from the side with a new opening to the west elevation of the building. This flat also provides for 2 bedrooms, (1 en-suite) a separate bathroom and living/dining and kitchen open plan area.

Externally, the existing hard standing area would be laid out to provide pedestrian access to the rear flat as well as access to the existing front door for the building.

Outdoor amenity spaces would be provided to the side of the building for the rear flat, accessed by a French door to the living/dining area and the front flat would have a fenced in area behind the pavement line to Worthing Road.

Bin and cycle storage would be provided within the private space for each flat and secure facilities could be secured at Reserved Matters Stage.

No additional building work is proposed.

Scale and Appearance

No additional accommodation is proposed and the layout is for illustrative purposes only with appearance a matter reserved for future consideration.

Any proposed changes, would enhance the visual amenity of the locality, introducing a more domestic character to the site, removing the existing, discordant commercial uses from the streetscene.

Environment and Landscaping

Appearance and Landscaping are matters reserved for future consideration, however indicative landscaping shows new planting to the west of the site and directly abutting the pavement to provide a soft buffer to the amenity space for the flats.

Access

Vehicular access to the site is as existing, with minor changes to the layout of the hard standing area, to provide pedestrian access to the rear flat.

The development provides for 2 off street parking spaces per flat with bike storage available within the private spaces attributed to both flats.

The level of usage for vehicles is considered to reduce from the existing office use, where 170sqm of office space could generate up to 24 vehicle movements per day. 2 x 2 bedroom flats are likely only to generate a maximum of 16 movements per day, reducing the impact on the local highway network.

Pedestrian access to the development would be through the existing front door and a new entrance door to the side of the building, which will both provide level threshold access into the properties. The external patio areas would also allow level access from the flats.

Internally, the building would be designed to meet the requirements of Part M of the Building Regulations.

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Sustainability

The dwellings would be designed to meet Part L of the Building Regulations, with respect to Conservation of fuel and power. The works necessary to the building to comply with Part L will provide for energy efficiency savings compared with the existing building.

The site is sustainably located and residents will be able to walk to a wide range of shops and services as well as public transport links.

Crime Prevention

The site is considered to be in a low risk-of-crime area. However, crime prevention measures will be provided within the scheme design to achieve a development that responds to the seven key principles of 'Secured-by-Design'.

In particular, the scheme has only one point of vehicular entry which has good natural surveillance, the proposed development has defensible amenity space, and doors & glazing would have laminate glass and locks to the relevant British Standard. Windows would also have locks to the relevant British Standard.

Summary

Overall the proposed change of use would have no adverse impact on the vitality of the local economy and would provide for a defined housing need, whilst providing for a development that can be designed to enhance the visual amenity of the locality.

The proposed scheme does not provide for Developer Contributions towards Affordable Housing in the District for the aforementioned reasons of viability. This will enable ICIS to move on from this property to smaller premises and continue their much respected activities supporting the wider community.

The proposal is therefore considered to represent sustainable development and therefore the presumption in favour of development should be applied to this scheme.

I trust that this clarifies the position, yet if you have any queries, do not hesitate to contact me

Yours sincerely
ECE Planning

C Barker MATP MRTPI
Director

Enclosures

