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ARCHITECT

**Response to Ward Councillor Comments
28th November 2025**

**The Old Manor House (1 Summerley Lane), Felpham, Bognor Regis,
PO22 7HN**

Purpose of This Document

This document responds specifically to the representation submitted by Councillors Stainton and Madeley regarding planning application FP/164/25/PL. A full and detailed response to all neighbour representations, including technical evidence and policy considerations, is already set out in the main rebuttal.

This note should therefore be read alongside that primary response.

Summary of Councillor Concerns

The councillors raise the following points:

1. Historic use and former status of the building
2. Allegation of overdevelopment
3. Width and usability of the shared access driveway
4. Length of past construction works
5. Parking habits of the applicant on Summerley Lane
6. Anxiety among elderly neighbours in adjoining properties
7. Visibility concerns when exiting onto Felpham Way
8. Suggestion that WSCC Highways carry out a site visit
9. Offer to meet the case officer on site

Each topic is addressed below.

1. Historic Use and Building Status

The building's history, including previous multi-occupancy and its former institutional uses, does not determine the acceptability of the current application. The assessment must focus on whether the proposal gives rise to unacceptable impacts on amenity, character or highway safety. These issues are addressed in detail within the main rebuttal.

2. Allegation of Overdevelopment

The suggestion of overdevelopment is not supported by the technical evidence:

- The proposal provides only six en-suite guest rooms, with no communal or social facilities.
- WSCC Highways confirms that the scheme does not materially intensify the use of the existing access.
- The lawful fallback position of a potential 15-bedroom dwelling represents a significantly greater level of theoretical activity.
- Past uses, including the former nursing home and the Autism Sussex facility, generated substantially higher levels of daily movements.

There is no evidence to indicate that the proposal constitutes overdevelopment.

3. Driveway Width, Geometry and Passing Ability

Concerns regarding the width and functionality of the driveway are noted. The physical characteristics show that the access operates safely.

The driveway measures approximately 3.7 metres wide at its junction with Summerley Lane, widening to around 4.5 metres closest to No. 6 Summerley Lane. The total length is approximately 25 metres, with the access into 1 Summerley Lane situated at around the 20-metre point. Parking for 1 Summerley Lane is immediately to the left on entry.

This means that only a short shared section is used by all properties. Throughout this distance there is clear, unobstructed visibility allowing vehicles to recognise each other well in advance. Nos. 6, 8 and 10 Summerley Lane each have private driveways within their curtilage, enabling turning on private land rather than within the shared driveway.

Furthermore, the entrance from Summerley Lane is wider than the internal section, enabling a vehicle to wait safely without obstructing the flow of traffic on Summerley Lane. The geometry allows safe, efficient entry and exit movements.

These characteristics support the position of WSCC Highways, who reviewed the access geometry, visibility conditions and manoeuvring arrangements and confirmed that the proposal raises no highway safety concerns.

4. Historic Construction Activity

References to extended construction works relate to previous renovation activity and are not relevant to the determination of a change-of-use application. Planning decisions must focus solely on the operational impacts of the proposed use.

5. Parking by the Applicant on Summerley Lane

The councillors reference the applicant's personal parking patterns. Summerley Lane is a public highway with no parking restrictions, and such personal behaviours are not material to the planning assessment.

The proposal provides eight dedicated on-site parking spaces, exceeds WSCC standards and does not rely on or increase on-street parking demand.

6. Concerns Relating to Elderly Residents

Concerns about anxiety among elderly neighbours are understood; however, personal characteristics of adjacent residents are not material planning considerations. The proper test is whether the proposed use creates unacceptable amenity or highway impacts.

All guest movements occur within the applicant's land, and WSCC Highways confirms that the access arrangements are safe.

7. Visibility at Felpham Way Junction

The councillors raise concerns regarding visibility when exiting onto Felpham Way. WSCC Highways reviewed these issues as part of their statutory consultation and raised no safety concerns. Their assessment carries full weight in the planning process.

8. Suggested Highways Site Visit and Previous Intensity of Use

While the councillors request that WSCC Highways visit the site, the authority has already completed its statutory assessment using the submitted plans, the access geometry, and standard methodology. A site visit is not a mandatory requirement, and the absence of one does not diminish the validity of their professional conclusions.

It is also important to consider the property's recent operational history. On 27 November 2025, Samantha Fievez, Regional Area Manager for Aspens (Aspens Charities - previous owners of the property), confirmed in writing that the closure of the former Autism service was due to internal operational and financial reasons. Specifically, the layout of the building did not meet the needs of the individuals they supported, and the lack of appropriate referrals made the service financially unviable.

This evidence confirms that traffic or access issues played no role in the closure. In fact, the former use involved far greater daily staff presence, visiting professionals, vehicle movements and complex support routines. By contrast, the proposed six-room guest accommodation represents a considerably lower-intensity use, with far fewer vehicle movements and significantly reduced operational activity.

9. Offer to Meet on Site

The offer is noted. The applicant is willing to cooperate fully should the case officer consider a site visit beneficial. However, the councillors' representation does not introduce any new technical or policy issues that would alter the assessment.

Conclusion

The comments raised by the councillors largely repeat matters already addressed in neighbour representations and do not introduce any new material planning considerations. None of the points raised provide evidence of harm that would outweigh:

- the professional assessment of WSCC Highways
- the compliant on-site parking provision
- the lower-intensity nature of the proposed use compared to historic uses
- the lack of any identified amenity or highway impact
- the consistency with the property's planning history

For these reasons, the proposal continues to accord with relevant planning policy and should be supported.