

Partial Retention, Extension
and Reconstruction of 2-
Storey Building to Provide 1
No. Class E Shop Unit; 1 No.
Commercial Unit for any Use
within Class E or as a Sal-
Generis Beauty
Therapist/Nail Bar and 3No.
Flats (3 x 2-bedrooms),
Parking, Secure Cycle &
Refuse Storage Facilities
At

107 Felpham Way, Felpham,
Bognor Regis, PO22 8QB

Planning, Design & Access Statement



On behalf of
Sussex Reeves Home
Limited

PTP
Pickup Town Planning

Matthew R. Pickup, MRTPI

Pickup Town Planning

3rd March 2021

Final

1.0 Introduction

1.1 Planning permission is sought for the partial retention, extension and construction of a two storey building which would comprise a small ground floor shop unit, fronting onto Felpham Way, together with a separate commercial unit which could be used for purposes either within Use Class E or as a Beauty Therapist/Nail Bar (both sui-generis). This application follows the granting of planning permission by the Local Planning Authority (LPA) for the *“Conversion, alteration & extension to provide 1 No. Class A1 Shop Unit, 1 No. Flexible Use Commercial Unit Use Classes A1, A2 and B1, a health centre or clinic (and no other uses within Class D1) or Beauty Therapist/Nail Bar only(Sui Generis) & 3 No. Flats together with secure cycle & refuse storage facilities”* (LPA Ref: FP/258/19/PL) on 29th July 2020. This decision was then revised by minor material amendment application FP/185/20/PL on 26th November 2020 which proposed to raise the height of the ridge of the rear part of the proposed building.

1.2 The applicant has now reconsidered his approach to redeveloping this site and is of the opinion that a much higher standard of accommodation could be achieved by a purpose-built replacement 2-storey building. The proposed building would have the same footprint as the previously approved extended building, however, is of a more traditional two storey design with eaves and ridge set at a height to mimic those of 109 Felpham Way to the east.

1.5 Consequently, this revised scheme seeks to retain a retail and commercial frontage on to the property’s Felpham Way façade whilst utilising the first floor and rear element of the building to provide three dwellings. The proposed layout would be entirely consistent with the pattern and context of development in the area.

1.6 This statement describes our Client’s proposal and places it in context with relevant national and development plan policy, guidance and advice. It will be concluded that our Client’s application proposal should receive support and be granted planning permission.

2.0 Application Site Description

2.1 The application site previously accommodated a one/two storey building located within a small parade of shops, and other commercial property, on the north side of Felpham Way in Felpham. The building was previously occupied by the Co-op as a grocery store and more recently, for a short period, as an antiques shop. The building has been partially demolished with just the front and side walls remaining.



Figure 1 Application Site and Surrounding Area

2.2 What remains of the building is set back from the edge of the Felpham Way footpath by approximately 8.0m with the front forecourt being used for vehicle parking. The pre-existing building, was constructed with red brickwork elevations beneath a ridged, gabled roof at the front with a larger two storey flat roofed building at the rear. When previously occupied the front section of the building was used as a retail sales/display area with the rear part as an office and store. To the rear of the site is a concrete yard area beyond which is an area of rough ground which fronts onto Flax Mean a residential cul-de-sac accommodating numerous bungalows and chalet bungalows. The northern part of the site falls outside the application site boundary.



Figure 2 Above Left: Front of Application Site Right: Rear Elevation of 107 Felpham Way
 Pre-Existing Building



Figure 3 Existing Property Frontage onto Felpham Way

2.3 The application site has a width and depth of approximately 13.0m and 35.0m respectively. What remains of the pre-existing building is sited 8.0m back into the site from the Felpham Way footway and has a gap between its east elevation, and the adjacent boundary, of between 3.6m and 2.6m. The buildings footprint is 8.8m wide (narrowing to 8.5m at the rear) and 20.8m long. The front element of the building was 3.6m high to the underside of its eaves with a ridge height of 6.85m. The rear part of the building had a height of 6.2m to the top of the flat roof's parapet wall. This was fenestrated with a pair of double access doors as well as several security windows at both ground and first floor level. An external staircase located adjacent the sites western boundary allowed access to the first-floor part of the property. Internally, the front single storey portion of the building had a retail floor area of some 100sq.m.; the rear office store area has a combined gross internal floor area of approximately 90sq.m.



Figure 4 View from Rear of Site towards Felpham Way

2.4 The site is within the Felpham's designated Built Up Boundary and does not fall within a conservation area of an area that is at risk of flooding (i.e. it is in a Flood Zone 1 area). The site is approximately 3.5km to the north of the Bognor Regis Town Centre and is some 150m to the east of the nearest bus stop which is served by the 69, 600, 141 and 700 Coastliner providing services to and from Bognor, Littlehampton, Yapton and Chichester. The site is also in close proximity (140m) to public playing fields and recreational open space at King George V Recreation Ground which can be accessed from Felpham Gardens which is on the opposite side of Felpham Way.

3.0 Planning History

3.1 The following planning history is considered to be relevant to the determination of this application.

FP/172/16/PL

"Change of use from grocery store (A1 Shops) to tyre fitting centre & enlargement of rear double doors."

Application refused planning permission on 16th September 2016

Reasons for refusal:

- "1 The proposed development will introduce a general industrial, nonconforming use within a predominantly residential location which will result in an increase in activity, noise and general disturbance to the detriment of the living conditions and quiet enjoyment of surrounding residential properties in conflict with policies GEN7, GEN32 & GEN34 of the Arun District Local Plan, policy BT3 of the Felpham Neighbourhood Plan and paragraphs 17 & 123 of the National Planning Policy Framework.*
- 2 The proposed development will introduce a general industrial, nonconforming use within a predominantly residential location which will result in an increase in activity, noise and general disturbance to the detriment of the living conditions and quiet enjoyment of surrounding residential properties in conflict with policies GEN7, GEN32 & GEN34 of the Arun District Local Plan, policy BT3 of the Felpham Neighbourhood Plan and paragraphs 17 & 123 of the National Planning Policy Framework. In the absence of supporting information outlining that the retail use is no longer viable, the Local Planning Authority is not satisfied that the existing retail premises would no longer serve the retail needs of the community. The proposal is therefore contrary to policy DEV30 of the Arun District Local Plan and Policy BT4 of the Felpham Neighbourhood Plan."*

FP/101/18/CLP

"Lawful development certificate for a proposed change of use of first floor to self contained flat."

Certificate granted 31st August 2018

- 3.2 A further planning application was submitted by our clients on 13th February 2019.

FP/32/19/PL

"Conversion of part retail unit & storage area to form 9 No. residential units consisting of 3 No. 1 bed & 6 No. 2 bed dwellings & new access to rear".

Application withdrawn 7th June 2019.

- 3.3 This application proposed the retention of part of the frontage shop unit (i.e. approx. 53sq.m.) together with the construction of a two-storey rear extension following the demolition of the 2-storey flat roofed part of the existing building. Additionally, it was proposed to construct a two storey 'block' of development at the north end of the site which has a frontage on to Flax Mean. The extended part of the building would have accommodated 5 flats (3 x 1-bed; 2 x 2-bed units) with the rear block housing a further 4 x 2-bedroom dwellings. The proposal retained the front forecourt area onto Felpham Way and created an access from Fax Mean. A centrally located amenity area separated the two buildings by a distance of approximately 9.0m.

- 3.4 The applicants were advised by the case Planning Officer that the application could not be supported with the application being withdrawn on 7th June 2019.

FP/258/19/PL

3.5 Planning permission was granted by Arun District Council on 30th July 2020 for the "Conversion, alteration & extension to provide 1 No. Class A1 Shop Unit, 1 No. Flexible Use Commercial Unit Use Classes A1,A2 and B1, a health centre or clinic (and no other uses within Class D1) or Beauty Therapist/Nail Bar only(Sui Generis) & 3 No. Flats together with secure cycle & refuse storage facilities (resubmission following FP/32/19/PL)".

FP/185/20/PL

3.6 Having been granted planning permission the applicant reviewed the approved drawings and considered that it would be more practical to build the scheme out by constructing the buildings ridge at a single level. The scheme, that was granted permission under FP/258/19/PL, proposed the retention of the first 5.0m (measured from its front (south) elevation) of the existing structures gabled roof. Beyond the original length of roof it was proposed to provide a slightly lower roof (0.68m lower) for the remaining 17.4m. The minor material amendment application, submitted under FP/185/20/PL sought to vary condition 2 attached to FP/258/19/PL and revise the approved development by maintaining the pre-existing buildings ridge height, at 6.85m along the entire length of the building.

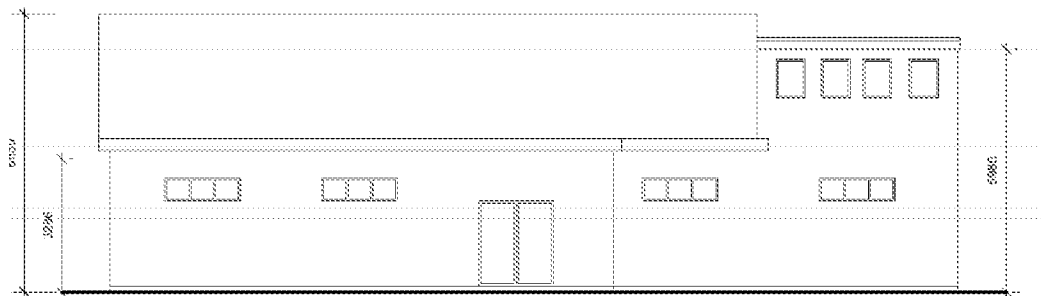


Figure 5 Original Building

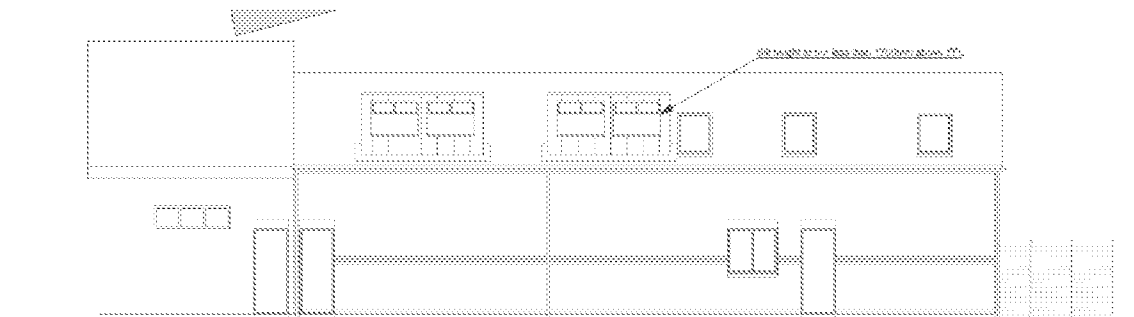


Figure 6 Extended Building Permitted Under FP/32/19/PL

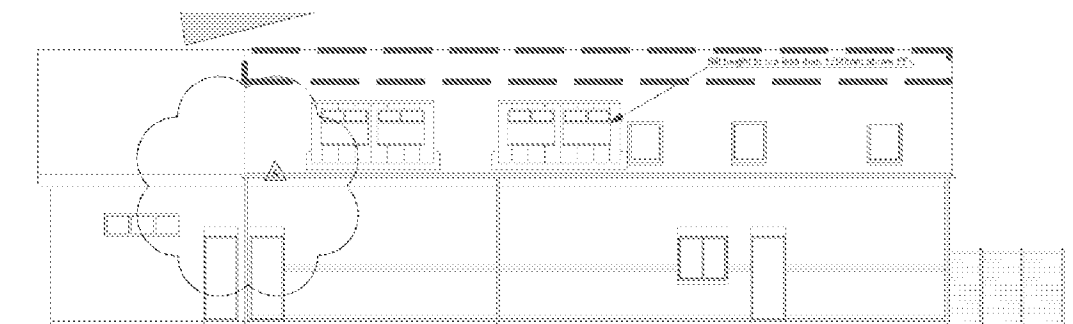


Figure 7 Minor Material Amendment Permitted Under FP/185/20/PL

3.7 Figures 3, 4 and 5, above, show the original/existing building, and the building permitted under both FP/258/19/PL and FP/185/20/PL.

3.8 The principal change proposed under FP/185/20/PL was the retention of the buildings original roof ridge height, line and profile which was shown as being continued to cover the proposed rear extension. Whereas the building permitted under FP/258/19/PL had a ridged roof in two sections (front 6.85m high; rear, 6.23m high) this proposal resulted in the entire building being covered by a ridged roof with a height of 6.85m. In effect, it was proposed to increase the height of the rear part of the proposed building's roof ridge by 0.62m. Additionally, the approved revisions allowed the buildings eastern eaves to be provided in one line avoiding the need to construct a complicated junction between the old and new parts of the building. In all other respects the building would remain as permitted under FP/258/19/PL.

4.0 Proposed Development

4.1 A grant of planning permission is sought for the redevelopment of the existing site with the partial retention, extension and reconstruction of the pre-existing structure to provide a two-storey building which would comprise:

- 1 No. Class E1 Shop Unit (34.47sq.m);
- 1 No. Flexible Use Commercial Unit (41.5sq.m) – Use Classes E1 or as a Sui-Generis Beauty Therapist/Nail Bar;
- Unit 1 - 1 No. x 2-Bedroom, 3 Person Flat @ 61.05sq.m.(with external amenity area);
- Unit 2 - 1 No. x 2-Bedroom, 3 Person Flat @ 74sq.m.;
- Unit 3 - 1 No. x 2-bedroom, 3 Person Flat @ 63.77sq.m
- Vehicle Parking;
- Secure Cycle Parking & Refuse Storage Facilities.

4.2 The proposed development would result in the provision of a 2-storey building which would sit on the same footprint as the building previously approved under FP/185/20/PL. As such, the proposed building would be 22.0m in length, 8.6m wide at the front (for a depth of approximately 5.3m) and 7.8m wide (for the rear 16.7m). Like the development permitted under application FP/185/20/PL the proposed building would be 1.2m longer than the partially remaining structure. The west elevation of the replacement building would be stepped away from the site's western boundary by about 0.9m.

4.3 This revised proposal for the redevelopment of this site would result in the construction of a building which would be very similar in height and scale to the building permitted under FP/185/20/PL. The building would be constructed with an asymmetrical roof structure when viewed from Felpham Way with eaves set at 4.7m on the buildings east side, 4.3m on the west side. The rear element of the building would step away from the site's western boundary by some 0.9m. From this point (i.e. 5.3m from the buildings south elevation) to the north the rear part of the building would, have its eaves set at 4.7m on both sides. The buildings ridge would be approximately 7.6m above ground level along its entire length. The scheme approved under FP/185/20/PL had its eaves and ridge shown at 3.6m and 6.85m respectively above ground level. As such, whilst the footprint of the proposed building would be identical to the scheme approved under FP/185/20/PL the eaves and ridge would be marginally higher by 1.1m and 0.75m.

4.4 Externally, the buildings front (south) elevation onto Felpham Way would retain a traditional shop front at ground floor with residential floorspace above. The buildings appearance would, when viewed from Felpham Way, mimic those of the buildings either side to the east and west, with a gabled frontage comprising both shop display and domestic fenestration.

4.5 The buildings proposed south elevation would be constructed with Ibstock Warnham Red brick, with white Marley Cedral boarding above. The ground floor shop windows would be powder coated aluminium with white UPVC windows at first floor. The buildings west, east and south facades would also be constructed with Ibstock Warnham Red brickwork, a white painted smooth cement render with white UPVC windows. The entrance door to the commercial unit would be powder coated aluminium with the 2 doors serving the three flats being painted timber.

4.6 Internally, the building would be subdivided to provide a 34.47sq.m. shop unit with a frontage onto Felpham Way. This would be accessed from a doorway in the building's front elevation. Immediately to the rear of this would be a flexible-use unit. This ground floor unit would have a floor area of 34.47sq.m. with entry being gained from the side passageway. A doorway would also be inserted into the Units west elevation allowing for future occupier's access to a side yard enclosure where they could either securely store bicycles or wheelie bins.

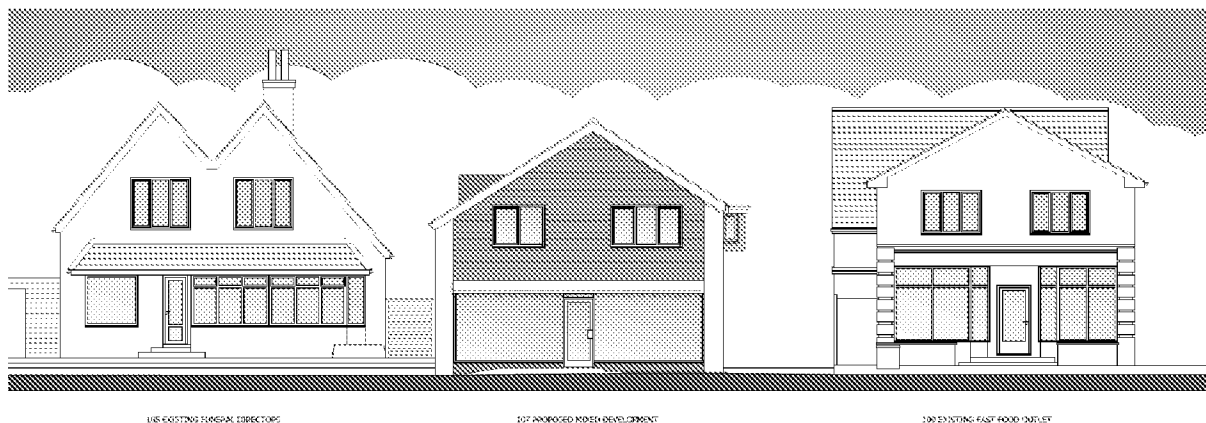


Figure 8 Proposed Mixed Use Building Viewed from Felpham Way

4.7 The proposed ground floor rear unit would, like the one permitted under FP/185/20/PL, be a flexible use unit allowing it to be occupied by any use within Class E or as a beauty therapist or nail bar, both of which are *sui-generis* uses. The Government introduced Use Class E in September 2020. Flexible use units are now commonly found in secondary and other peripheral shopping streets as they allow for “easy in – easy out” access to a range of small business enterprises without the constant need to apply for planning permission for a change of use.

4.8 To the rear of the flexible use unit, in the building's east elevation, would be several windows and doors serving both the flexible-use commercial unit and the three flats. The frontage shop would have a ‘return’ shop window, next to which would be a doorway and window serving the flexible use unit. Further north, along the east elevation moving north would be two entrance doors and another window. The first domestic entrance door would provide access to a lobby/stairwell area which would serve the two first floor flats. The second doorway would provide access to the ground floor flat.

4.9 **Unit 1** – on the ground floor, would be a 2-bedroom flat. This would have a floor area of 61.05sq.m and comprise one double bedroom, a single bedroom together with a combined lounge/diner/kitchen space. Bi-folding doors would allow access to a rear garden / amenity area within which would be secure bicycle and refuse storage facilities. This flat would also accommodate a bathroom which would be accessed from the combined lounge/diner/kitchen room.

4.10 **Units 2 & 3** on the first floor would also be 2-bedroom flats. The previously permitted scheme under FP/185/20/PL indicated a 'mezzanine' floor serving the flexible-use commercial unit at the front of the building with two long, thin flats in the roof space of the rear part of the building. This resubmitted scheme has taken a different approach and proposes the loss of the commercial 'mezzanine' and the provision of front and rear first floor flats. This has allowed each of the first-floor flats to be provided with a more comfortable living space and slightly larger floor area - with no 'sceilings' (i.e. angled roof/ceilings). As such, Unit 2 would be at the 'front' of the building with a floor area of some 74sq.m. This flat would utilise the area above the ground floor shop unit, which was previously proposed to be a commercial 'mezzanine', enabling the provision of two double bedrooms together with a combined lounge/diner/kitchen space and a bathroom.

4.11 **Unit 3** would be to the rear of the first floor. This flat would be a 2 bedroom flat with a floor area of some 63.77sq.m. comprising one double bedroom, a single bedroom together with a combined lounge/diner/kitchen space and a separate bathroom.

4.12 First floor windows within the buildings east elevation would consist of projecting box bays. As with the previously permitted scheme these windows would be constructed with mainly obscure glazing to their east facing panes together with clear glazed north and south facing panes. The one exception would be the centre pane of the box bay window serving the double bedroom of Unit 3. This pane would be clear glazed as it would be located between two first floor windows within the west facing elevation of No.109 opposite. The LPA previously accepted that windows designed this way allow the privacy of the occupiers of adjacent dwellings to be maintained whilst allowing the occupiers of these rooms an outlook.

4.13 At the front of the site, within the forecourt area, is an existing vehicle parking area. This area would be retained for vehicle parking in relation to the use of both the commercial and residential elements of the scheme. The business owners or their customers would utilise the spaces during the day time and the residents at night time. The forecourt is currently owned by West Sussex County Council. However, the applicant is in the process of purchasing this land from the County Council. The proposed onsite provision would be supplemented by available on-street parking (please refer to Transport Statement by Bright Plan Limited which accompanies this application).

4.14 Also provided within the application site are facilities for the secure storage of bicycles as well as refuse and recyclables, with a compound being provided at the northern end of the side access road.

5.0 Planning Policy

5.1 The relevant planning policy documents in respect of this application are the National Planning Policy Framework, revised 19th February 2019, (NPPF) and the Arun Local Plan 2011-2031 (July 2018). Additionally, there are several adopted Supplementary Planning Documents which are relevant to the proposed development.

National Planning Policy Framework

5.2 The National Planning Policy Framework (NPPF) was first published by the Government on 27th March 2012. The document was comprehensively revised on 24th July 2018 with further minor modifications undertaken on 19th February 2019.

5.3 Paragraph 7 of the Framework states that *“...The purpose of the planning system is to contribute to the achievement of sustainable development. 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...”* The NPPF states (at para.8) that *“... Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...”* The economic objective is described 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”*; The social objective requires planning to support *“...strong, vibrant and healthy communities, ... by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being...”* The environmental objective relates to the protection and enhancement of *“...our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy...”*

5.4 At paragraph 59 the Government comments that *“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”* Paragraph 63 of the NPPF clarifies that *“Provision of affordable housing should not be sought for residential developments that are not major developments...”* (i.e. less 9 dwellings or fewer). With regards to the delivery of housing paragraph 68 states *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly...”*

5.5 With particular regard to design the NPPF propounds at paragraph 124 that *“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, creates better places in which to live and work and helps make development acceptable to communities.”* Paragraph 127 goes on to state *“Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area... 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... 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... 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...”* Paragraph 130 goes on to state *“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions...”*

5.6 Section 9 of the NPPF relates to “Promoting sustainable transport”. Paragraphs 102 states that *“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) *the potential impacts of development on transport networks can be addressed;*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*

- c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*

5.7 Paragraph 103 continues *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*

Affordable Housing – Planning Practice Guidance

5.8 The government’s Planning Practice Guidance should be read in conjunction with the NPPF.

“Are there any specific circumstances where contributions through planning obligations should not be sought from developers?”

Planning obligations for affordable housing should only be sought for residential developments that are major developments. Once set, the Community Infrastructure Levy can be collected from any size of development across the area. Therefore, the levy is the most appropriate mechanism for capturing developer contributions from small developments.

For residential development, major development is defined in the National Planning Policy Framework as development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000 square metres or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015...”

Paragraph: 023 Reference ID: 23b-023-20190901

Revision date: 01 09 2019

Arun Local Plan 2011-2031 (July 2018)

5.9 The following Local Plan policies are considered to be relevant to the determination of the submitted planning application.

SDSP2 Built-up Area Boundary

“Built Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.”

RET DM1 Retail development

“...4. Village and suburban centres Change of use from retail will not be permitted for shops which are located outside the defined Town Centres and Local Service centres. An exception may be made where it can be demonstrated that retailing is no longer a viable use...”

H SP1 The Housing Requirement

"Within the plan period 2011 – 2031 at least 20,000 new homes will be accommodated in the District."

DSP1 Design

"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..."

DDM1 Aspects of form and design quality

This policy requires that the Council have regard to certain aspects including character, appearance/attractiveness, density, and scale.

DDM2 Internal space standards

"The planning authority will require internal spaces to be an appropriate size (having regard to the exceptions that may apply as referred to in paragraph 13.3.4) to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance."

T SP1 Transport and Development

"To ensure that growth in the District strengthens Arun's economic base, reduces congestion, works to tackle climate change and promotes healthy lifestyles; the Council will ensure that development: provides safe access on to the highway network; contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network."

ECCSP2 Energy and climate change mitigation

"All new residential and commercial development (including conversions, extensions and changes of use) will be expected to be energy efficient..."

Supplementary Planning Documents

Parking Standards Supplementary Planning Document, January 2020

5.10 At paragraph 1.7 it is explained that:

"This SPD is intended to outline Arun District Council's approach to parking at new developments (residential/commercial). It should be used to help determine the level of parking at new developments and provide the basis for the County Council's advice to local planning authorities on planning applications. planning applications."

5.11 It is stated at paragraph 2.12 of "Principle 1" that "Principle 1" that "Parking provision should be sufficient to accommodate demand whilst exploiting the potential for sustainable travel, minimizing adverse effects on road safety and avoiding increased on-street parking demand." Paragraph 2.13 continues "If parking could reasonably be expected to take place in existing streets, then it will be necessary to demonstrate through a parking capacity survey that there is sufficient capacity to accommodate the expected parking demand."

Felpham Neighbourhood Plan 2013-2029

5.12 The Felpham Neighbourhood Plan notes at paragraph 3.45 that *“Local shops and businesses provide a range of services but many are worried about future viability due to the increase in out of town shopping...”* Additionally paragraph 3.48 recognises that *“Employment locally is dominated by wholesale and retail trades. A lot of work is seasonal and most residents travel more than two kilometres to work.”* The section “Supporting business and enterprise” at paragraph 4.4 states that *“Felpham needs to retain a good range of different shops and businesses and support better online connections to help businesses thrive....”* With regards to residential development, and the need for additional homes, the NP states at paragraph 5.2 *“Felpham does not have a housing allocation and indeed does not have any significant areas of land left to build upon. However it recognises that small scale development opportunities will come forward and the Plan allows for sensitive, appropriate, well designed development....”*

5.13 The following Neighbourhood Plan policies are considered to be relevant to the determination of the submitted planning application.

BT1 Business expansion

“Proposals to upgrade or extend existing employment sites will be supported provided that the impact on the amenities of surrounding properties is acceptable....” The text at paragraph 7.1 which supports this policy states *“Encouraging business to remain in Felpham is important given the limited amount of employment opportunities. Proposals to upgrade or extend should be encouraged.”*

BT4 Retail premises

“Development proposals involving changes of use of ground floor premises from retail to non retail uses will only be permitted where it can be shown that the development would not harm the vitality of local shopping facilities or the amenities of the area.”

ESD1 Design of new development

“New development which would have an effect on the appearance or character of the surrounding area must be of a high quality of design and must contribute to local character by creating a sense of place appropriate to its location.”

6.0 Planning Considerations

6.1 This application seeks a grant of full planning permission for the redevelopment of the existing site with the partial retention, extension and reconstruction of the pre-existing structure to provide a two-storey building which would comprising: 1 No. Class E Shop Unit (34.47sq.m); 1 No. Flexible Use Commercial Unit (41.55sq.m) – Use Class E1 or as a Sui-Generis Beauty Therapist/Nail Bar; 3 No. 2-Bedroom Flats @ 61.05sq.m. (Unit 1); 74sq.m. (Unit 2); 63.77sq.m (Unit 3) which would be served by a Vehicle parking Area; Secure Cycle Parking and Refuse Storage Facilities.

Principle of Development

6.2 It is apparent, having reviewed the relevant Local and Neighbourhood Plan documents, that the application site falls within the Urban Area Boundary where there is a presumption in favour of sustainable development. Development to the east of the site comprises a similar mixed-use development (i.e. fish and chip shop at the front; 4 x 1 bedroom flats to the rear (LPA Ref: FP/208/08/)) whilst to the west is a funeral directors premises and flat. To the north of the site is residential development on Flax Mean. Additionally, two applications were permitted by the LPA in 2020 (LPA Refs: FP/258/19/PL & FP/185/20/PL) for the provision of a shop, flexible use commercial unit and 3 flats. As such, it is considered that the proposed mixed-use development would reflect the prevailing character of development in the immediate area and would be of an appropriate quantum and scale that is compliant with Local Plan policies SDSP2 (Built-up Area Boundary) and H SP1 (The Housing Requirement) as well as policy BT1 (Business expansion) of the Neighbourhood Plan.

Proposed Commercial Use

6.3 Having reviewed the site's planning history, and in particular the decision notice relating to planning application FP/172/16/PL (Change of use from grocery store (A1 Shops) to tyre fitting centre & enlargement of rear double doors), it is clear that the LPA support the retention of existing retail floorspace and other town centre uses within "village and suburban" centres. In this respect the applicants have looked very carefully at how they might be able to retain retail and commercial floorspace in their development whilst also providing a small amount of residential accommodation. Whilst the amount of commercial floorspace has reduced from that previously proposed under the permissions FP/258/19/PL & FP/185/20/PL the development would, nevertheless, result in the provision of two 'town centre' commercial units which together would have a combined floor area of some 76.02sq.m. (i.e. 34.47sq.m. and 41.55sq.m. respectively). It is considered that these units are of an appropriate size to support small local neighbourhood businesses. There would also remain the potential for the two units to be combined to form a single, larger frontage shop unit.

6.4 One of the sites previous occupiers, the Co-op, vacated a few years ago. Since this time, other than the antiques/bric-a-brac shop, the premises have remained unoccupied. This is probably due to the competition from both the Sainsbury's and Tesco superstores which are nearby in Shripney Road. Whilst it is accepted that there would be a reduction in the existing commercial floor area within the site the applicants consider that the two units would represent more attractive and manageable sized units than the previously existing single overly large shop.

6.5 The applicant is also aware that the mezzanine floor previously permitted under FP/258/19/PL & FP/185/20/PL located immediately above the shop would probably get very hot during the summer months and would, to all intents and purposes, only be used as ancillary storage. This area may then appear 'untidy' when viewed from Felpham Way. Additionally, the applicant is conscious of some of the comments of the Council's Planning Committee when it met to discuss the earlier proposal in July 2020. Some Members thought that the proposed flats under FP/258/19/PL were too small. As such, the area above the ground floor shop has now been incorporated into the overall residential floorspace to provide future occupiers a more spacious living environment.

6.6 As has been stated it is hoped that both of the proposed commercial units would be of interest to a range of smaller start-up retail and other, town centre business uses. The applicant believes that these units would provide an active shop frontage within the small parade in Felpham Way which would also offer employment opportunity within the village. Consequently, whilst the proposals represent a small reduction in the amount of commercial floor space previously proposed under FP/258/19/PL & FP/185/20/PL, they would provide two appropriately sized business units for tenants who would not want to occupy larger premises. As such, it is our view that the proposed development would contribute positively to the vitality and vibrancy of this local parade of business uses on Felpham Way. It is considered, therefore, that the proposal is compliant with Local Plan policy RET DM1 (Retail development) as well as Neighbourhood Plan policy BT4 (Retail premises).

Design & Residential Amenity

6.7 The proposed development would result in the redevelopment of a single building with a footprint that would be identical to the one permitted by the LPA under applications FP/258/19/PL & FP/185/20/PL. Whilst the proposal would retain part of the existing structure south, west and east elevations the profile and 'shell' of the proposed building would appear different to the one previously permitted.

6.8 As can be seen from the submitted drawings the building has been designed with an asymmetrical gable at its front elevation onto Felpham Way. Whilst slightly higher than the permitted ridge it can be seen from the streetscene drawing that the proposed ridge would be lower than the ridge of either adjacent buildings to the west (105) or the east (109). Similarly, the eastern eaves of the proposed structures frontage onto Felpham Way would be lower than those of 109 to the east whilst slightly higher than the 'cat-slide' style eaves of 105 to the west. The previously permitted scheme proposed to glaze the existing gable facing Felpham Way. However, this design solution would have resulted in significant levels of solar gain and overheating during the summer months and would also have meant that the units' future occupiers would have probably only used this part of the unit for storage, which may then have appeared untidy when viewed from Felpham Way. This issue has caused the applicant to reconsider the proposed redevelopment of the site.

6.9 The proposed design now incorporates domestic style windows to the buildings first floor, south elevation. Rather than serving the flexible use commercial unit these windows would allow light to a bedroom and a living room of Unit 2. The windows would mimic those within the south elevation of 109 and be consistent, in terms of their height and function, with the first-floor windows at 105.



Figure 9 *Original Property Frontage in a Context with Wider streetscene*

6.10 Officers will see from the submitted drawings that the proposed building would now have eaves set at a 'traditional' two storey height. Rather than 3.6m, as per permitted applications FP/258/19/PL & FP/185/20/PL, the eaves of the building's east elevation, and for much of its west elevation, would be set at 4.7m above ground level. This would mean that the first-floor habitable rooms on both sides of the building would be served by either traditional casement windows or by box bay windows. The previously proposed schemes relied on dormer windows and roof lights to provide first floor rooms with light and an outlook. The design solution now adopted is considered to be a huge improvement on the currently permitted schemes both aesthetically and in terms of the 'usability' of the floorspace within the proposed flats (i.e. all ceilings would be removed). The proposals would also have a minimal impact on the amenities of the occupiers of adjacent property given that the scale of the proposed building would remain largely as has been previously approved by the LPA.

6.11 All of the proposed two bedroom flats would be constructed with floor areas which would be compliant with the Nationally Described Space Standards (i.e. 61.05sq.m. (Unit 1); 74sq.m. (Unit 2); 63.77sq.m (Unit 3)).

6.12 Each of the flats would also be provided with both secure bicycle storage facilities and refuse and recyclables storage areas. Unit 1 would benefit from its own, securely fenced, private amenity space. Within this area would be a shed for the secure storage of bicycles; the occupiers of this unit would also be able to store their refuse/recyclables bins in this amenity area. The other two flats (Units 2 & 3) would be provided with refuse and recyclables storage areas at the northern end of the passageway to the east of the building. Furthermore, bicycle storage would be provided in a cycle store close to the front forecourt in the side passageway. Whilst these two flats would not be provided with any external amenity spaces it is apparent that the King George V Recreation Ground is very conveniently located being only 150m away at the southern end of Felpham Gardens.

6.13 With regards to design it is considered that the proposed development would result in the provision of a building that would both sit comfortably within the streetscene whilst providing its future occupiers a high-quality living/working environment. As such, it is considered that the proposed development would be of a high-quality design that would be compliant with Local Plan policies DSP1 (Design), DDM1 (Aspects of form and design quality) and DDM2 (Internal space standards) and Neighbourhood Plan policy ESD1 (Design of new development). Additionally, the proposed dwellings would be constructed to ensure compliance with current energy and water efficiency and would therefore be compliant with Local Plan policy ECCSP2 (Energy and climate change mitigation).

Vehicle Parking

6.14 This application is submitted with a Transport Statement by highways consultants Bright Plan Limited. Whilst it is recognised that this statement was written in connection with application FP/258/19/PL it is considered, nevertheless, that its conclusions remain relevant given that the revised proposals would result in a reduction in the amount of commercial floorspace (by 45sq.m.) and an increase in the number of bedrooms by one.

6.15 This Transport Statement concludes as follow:

- The application site is readily accessible on foot, by cycle and by public transport. There is a range of services and amenities available with walking and cycling distance of the site.
- The PIA record does not reveal any pattern in terms of distribution, severity or incident circumstances that would be exacerbated by the proposed development.
- A vehicle swept path analysis demonstrates that an estate car can access and egress the proposed parking bays.
- The onsite parking provision would fall short of the WSCC requirements, parking surveys demonstrate that overspill parking would be accommodated on the local road network.
- The proposed site is anticipated to generate a total of 19 daily 2-way trips with 9 occurring during the AM/PM peak hours respectively.
- The vehicle trip generation would reduce vehicle movements on the local road network there by benefiting highway capacity and safety.

6.16 As has already been stated the applicants are currently in the process of buying the front forecourt from West Sussex County Council. This would enable them to secure, beyond any doubt, the proposed on-site parking area for the use of the building's future occupiers and customers.

6.17 The Statement by Brightplan also demonstrates that, when surveyed (using the Lambeth Methodology), there were found to be an average of 81 available parking spaces on local roads within 200m of the application site.

6.18 Additionally, it is noted that the Council's 2020 Parking SPD states at "Principle 1" paragraph "2.13 *If parking could reasonably be expected to take place in existing streets, then it will be necessary to demonstrate through a parking capacity survey that there is sufficient capacity to accommodate the expected parking demand.*" The survey by Brightplan indicated that there was a significant amount of available parking on-street, close to the application site.

6.19 It is considered, therefore, that the proposed development is compliant with Local plan policy T SP1 Transport and Development.

Adjacent Land

6.20 Officers will note that a rectangle of blue edged land has been excluded from the development site at its northern end. The applicant has had discussions with the Council's Interim Housing Strategy & Enabling Manager with regards to being permitted to use Flax Mean for access. At the present time access rights have not been granted to the applicant. However, this situation may change sometime in the near future. Consequently, this land does not form part of the development site.

7.0 Conclusions

7.1 The applicant is of the view that the proposed development would result in the provision of a high-quality redevelopment of a large and tired retail unit in Felpham Way. The proposals would provide two attractive retail and commercial units as well as three new flats. The proposed development has been carefully thought out so that it: (i) provides the dwellings future occupiers with a high-quality living environment, and; (ii) does not have an adverse impact upon the residential amenities of the occupiers of adjacent residential development. It is considered that this proposal would be a significant improvement to the developments permitted under either FP/258/19/PL or FP/185/20/PL.

7.2 It is concluded that, in terms of current planning policy, the proposed development would be an example of 'sustainable development' and would, as such, be compliant with both the NPPF and the Arun Local Plan and the Felpham Neighbourhood Plan.

7.3 The applicant respectfully requests that Officers and Councilors look favourably on this proposed development and grant planning permission.