



Planning Statement

Jellyfish House, 31 London Road, Reigate, RH2 9SS

Application for Prior Approval pursuant to Class MA of Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to allow the change of use from bank (Class E) to residential (C3) in the form of 21 flats (10 x studio 11 x 1-bed)

November 2024

J Butterworth Planning Limited

71-75 Shelton Street

London, WC2H 9JQ

jeremy@jbutterworthplanning.co.uk

[**jbutterworthplanning.co.uk**](http://jbutterworthplanning.co.uk)

Title	Planning Statement
Project	Jellyfish House, 31 London Road, Reigate, RH2 9SS
Client	Ganco
Issue	Final
Project No	24024

Prepared By Jeremy Butterworth BSc (Hons) MA MRTPI

J Butterworth Planning Limited is registered in England & Wales Company No. 9533429
Registered Office: 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

Formatted for double-sided printing.

Limitations

This document has been prepared for the stated purpose in accordance with the Agreement under which our services were commissioned, and should not be used for any other purpose without the prior written authority of J Butterworth Planning Limited. I accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

© J Butterworth Planning Limited. All rights reserved. No part of this document may be reproduced or published in any form or by any means, including photocopying, storage on computer or otherwise without the prior permission of the copyright holder.

Contents

1	Introduction and Development Proposals.....	4
1.1	Introduction	4
1.2	Proposed Development.....	4
1.3	Supporting Documents.....	5
2	Site Location, Description and History	6
2.1	Site Location and Description.....	6
2.2	Planning History	6
3	Planning Assessment	9
3.1	Introduction	9
3.2	Transport impacts of the development, particularly to ensure safe site access.....	12
3.3	Contamination risks in relation to the building.....	13
3.4	Flooding risks in relation to the building.....	13
3.5	Impacts of noise from commercial premises on the intended occupiers of the development ..	15
3.6	The impact of the change of use on the character or sustainability of the Conservation Area..	15
3.7	The provision of adequate natural light in all habitable rooms of the dwellinghouses	16
3.8	The impact on intended occupiers of the development of the introduction of residential	17
3.9	The impact on the local provision of the type of services lost.....	17
3.10	The fire safety impacts on the intended occupants of the building.....	17
3.11	Development Plan and NPPF.....	18
4	Summary and Conclusion	20

1 Introduction and Development Proposals

1.1 Introduction

- 1.1.1 This statement is submitted in support of an application for prior approval pursuant to Class MA of Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to allow the part change of use from Class E to residential (C3) in the form of 21 flats at ground and first and second floor levels (10 x studio and 11 x 1-bed) (the ‘proposed development’) at Jellyfish House, 31 London Road, Reigate, RH2 9SS (the ‘site’).
- 1.1.2 The application is submitted on the basis that the proposed change of use is permitted by Class MA of the 2015 Order.
- 1.1.3 The proposed development seeks to utilise the elevational amendments already approved. No changes are proposed as part of the prior approval and implementation of the permission 24/00935/F can be secured by condition.
- 1.1.4 This is discussed in more detail below.

1.2 Proposed Development

- 1.2.1 The proposed development is described as:

Prior Approval pursuant to Class MA of Schedule 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to allow the part change of use from Class E to Class C3 residential forming 21 flats (10 x studio and 11 x 1-bed)

- 1.2.2 The proposed dwellings will be as follows:

	Ground Floor	First Floor	Second Floor
Flat No.	1 – Studio @ 37.21	8 – 1-Bed @ 54.54	15 – 1-Bed @ 54.54
Type	2 – Studio @ 47.62	9 – Studio @ 47.62	16 – Studio @ 47.62
Size (sqm)	3 – 1-Bed @ 50.83	10 – 1-Bed @ 50.83	17 – 1-Bed @ 50.83
	4 – 1-Bed @ 50.30	11 – 1-Bed @ 50.30	18 – 1-Bed @ 50.30
	5 – 1-Bed @ 52.22	12 – 1-Bed @ 52.22	19 – 1-Bed @ 52.22
	6 – Studio @ 37.36	13 – Studio @ 37.36	20 – Studio @ 37.36
	7 – Studio @ 37.01	14 – Studio @ 37.01	21 – Studio @ 37.01

- 1.2.3 The site sits in a sustainable location in the town centre, but the site contains sufficient parking for the proposed development (as discussed in more detail below). In addition, cycle parking and refuse storage can be provided in accordance with the relevant standards.
- 1.2.4 The proposed development seeks to utilise the elevational amendments already approved. This is discussed in more detail below.

1.3 Supporting Documents

1.3.1 The application is accompanied by the following documents in addition to this Statement:

- Application Form
- CV9276 OS Site Location Plan
- CV9276 EX00 Existing Site Plan
- CV9276 EX01 Existing GF & 1F Plans
- CV9276 EX02 Existing 2F & Roof Plans
- CV9276 EX03 Existing Elevations
- CV9276 EX04 Existing Elevations
- CV9276 PR00 Proposed Site Plan
- CV9276 PR01 Proposed GF & 1F Plans
- CV9276 PR02 Proposed 2F & Roof Plans
- CV9276 PR04 Proposed Elevations
- CV9276 PR04 Proposed Elevations

2 Site Location, Description and History

2.1 Site Location and Description

- 2.1.1 The application site consists of a three-storey office building which is located on the northern side of London Road close to the junction with Castlefield Road and lies between Reigate town centre and the railway station, opposite Reigate Castle Grounds.



Site as seen from London Road

- 2.1.2 To the west of the site lies a property which is in residential use as flats (23-25 London Road). To the north of the site is a three-storey block of flats located on Yorke Gardens.
- 2.1.3 To the east of the site is another office building (Chapter House).
- 2.1.4 The site lies within the Reigate Town Centre boundary.
- 2.1.5 The site is also within the Reigate Conservation Area.
- 2.1.6 The site is surrounded by a mix of commercial and residential uses and sits opposite to the Reigate Castle Grounds.
- 2.1.7 The site is easily accessible by sustainable forms of transport and is 280 metres from Reigate railway station which provides services towards Reading, Gatwick Airport and London Victoria.
- 2.1.8 In addition, frequent bus routes pass the site towards Epsom, Sutton, Guildford and surrounding areas.

2.2 Planning History

- 2.2.1 The planning history of the property can be summarized as follows:

- Conservation area notification to reduce height of row of conifers approximately 35m in length by 2.4m in height located in rear car park and remove 1 low limb from ash tree located in front car park. Ref. No: 01/00392/can | status: approved with conditions
- recladding of an existing building and the construction of a new service core to accommodate alternative means of escape lift and disabled persons toilets to accord with current legislation. Ref. No: 87/01260/f | status: g
- removal of office occupancy condition. Ref. No: 87/08770/f | status: g
- removal of condition 5 from approved development under re87p/126. Ref. No: 87/11360/f | status: refused
- erection of lean to shelter at rear over existing external staircase ref. No: 90/06050/f | status: approved
- construction of 2 dormer windows with louvered venting on west elevation ref. No: 90/11560/f | status: approved
- display of flag advertisement (amended plans received 14.11.94. Showing resiting of proposed flagpole) ref. No: 94/11260/adv | status: refused
- proposed new glazed entrance feature, new finishes to existing elevations and alterations to existing hard landscaping. (drwg no. Pl 100 - 107) amended plans were received on 3/7/06 showing coloured panels enclosing new air-conditioning pipework to match new rendered panels. (drwg no. 7615/pl105a & pl107b) ref. No: 06/01018/f | status: withdrawn by applicant
- proposed new glazed entrance lobby and canopy, new external duct casings and alterations to existing hard landscaping. (drwg no. 7615_pl100 - 108) amended plans received on 16/8/2006 revised block plan showing all trees on site (drwg no. Pl101a and annotated photos) additional details were received on 24/8/06 showing a tree protection plan & arboricultural method statement & preliminary acoustic assessment. (drwg no. 6319/01a) ref. No: 06/01500/f | status: approved with conditions
- submission of tree protection details pursuant to condition no 3 of permission ref no 06/01500/f for new glazed entrance lobby and canopy. Ref. No: 06/01500/det03 | status: approved
- submission of details of materials pursuant to condition to 05/1500/f for new entrance lobby and canopy. Ref. No: 06/01500/det02 | status: approved
- submission of noise attenuation measure details pursuant to condition 4 of planning permission 06/01500/f for new glazed entrance lobby and canopy drawing no's: 7615_wd 15-104 rev b, 261119-01 rev a, 02 rev a, 03 rev a ref. No: 06/01500/det04 | status: approved

- reduce height of 1 magnolia. Sycamore lateral branch reduction by up to 30% of branches overhanging 29 London Road. Install cable brace in 1 cypress and reduce laurel by 30% exempt works. Ref. No: 08/02198/can | status: approved
- single sided non lit roadside small monolith sign ref. No: 18/01083/adv | status: express consent (adverts)
- Warene house, 31 London Road, Reigate detail permission - erection of garden shed for the storage of garden tools. Warene house, 31 London Road, Reigate ref. No: 77p/0838 | status: cp

2.2.2 In addition, planning permission was granted on 17th September 2024 for ‘infill extensions and elevation amendments to create additional window openings’ (Ref: 24/00935/F).

2.2.3 These elevational amendments are intended to be implemented in conjunction with the current application to enable the conversion to residential.

2.2.4 These external alterations can be secured by condition to be undertaken prior to the implementation of this prior approval scheme.

3 Planning Assessment

3.1 Introduction

3.1.1 The application is submitted under the requirements of Class MA of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016 (the 'Order') in relation to the change of use of buildings in Class E use to a use falling within Class C3.

3.1.2 The provisions of Class MA.1 state that development is not permitted by Class MA:

a) This paragraph has been deleted by The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2024

b) unless the use of the building fell within one or more of the classes specified in subparagraph (2) for a continuous period of at least 2 years prior to the date of the application for prior approval;

Subparagraph 2 states that the classes mentioned in sub-paragraph (1)(b) are the following classes of the Use Classes Order—

(a) the following classes of the Schedule as it had effect before 1st September 2020—

(i) Class A1 (shops);

(ii) Class A2 (financial and professional services);

(iii) Class A3 (food and drink);

(iv) Class B1 (business);

(v) Class D1(a) (non-residential institutions – medical or health services);

(vi) Class D1(b) (non-residential institutions – crèche, day nursery or day centre);

(vii) Class D2(e) (assembly and leisure – indoor and outdoor sports), other than use as an indoor swimming pool or skating rink;

(b) on or after 1st September 2020, Class E (commercial, business and service) of Schedule 2.

The planning history shows the use of the premises as a purpose built office block since its construction in the 1980s.

c) This paragraph has been deleted by The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2024

d) if land covered by, or within the curtilage of, the building—

i. is or forms part of a site of special scientific interest;

- ii. is or forms part of a listed building or land within its curtilage;*
- iii. is or forms part of a scheduled monument or land within its curtilage;*
- iv. is or forms part of a safety hazard area; or*
- v. is or forms part of a military explosives storage area;*

The site does not have any of the above designations.

e) if the building is within—

- i. an area of outstanding natural beauty;*
- ii. an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981;*

The site is not within an AONB or area specified in the Wildlife and Countryside Act.

3.1.3 Paragraph W of the Order requires the application to be accompanied by:

1. Written description of the proposed development
2. A plan indicating the site and proposed development
3. A floor plan indicating the dimensions and proposed use of each room, the position and dimensions of windows, doors and walls, and the elevations of the dwellinghouses
4. A statement specifying the net increase in dwellinghouses proposed by the development
5. Developer's contact address; and
6. Developer's e-mail address if the developer is content to receive communications electronically.

3.1.4 This Statement and the accompanying Application Form provides this information, and the requisite plans are also submitted.

3.1.5 Paragraph W (5) requires local planning authorities on receipt of applications to determine whether the development is likely to result in a material increase or a material change in the character of traffic in the vicinity of the site and if so to consult the relevant highway authority. To assist in this process this Statement includes a section on traffic impacts.

3.1.6 Paragraph W (6) requires local planning authorities to consult the Environment Agency where the development is located within an area within Flood Zone 2 or Flood Zone 3; or in an area within Flood Zone 1 which has critical drainage problems and which the Environment Agency has notified the authority for the purpose of paragraph (zc) (ii) in the Table in Schedule 4 to the Procedure Order. To assist in this process this Statement includes a section on flood risk which confirms that the property is located within Flood Zone 1.

- 3.1.7 It is acknowledged in Paragraph W (9) that further information regarding the impacts and risks referred to in J2 (namely transport and highways impacts, contamination and flood risks) can be requested in order to determine the application. The Applicant is committed to respond to any such request, although these are considered unnecessary given the information that is provided.
- 3.1.8 It is also recognised that in determining this application, the LPA shall have regard to the National Planning Policy Framework (NPPF) as if the application were a planning application. Accordingly, and to assist this process a statement on the effect of the Framework is included below.
- 3.1.9 Class MA development is permitted subject to the condition that before beginning the development, the developer shall apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to:
- a. transport impacts of the development, particularly to ensure safe site access;
 - b. contamination risks in relation to the building;
 - c. flooding risks in relation to the building;
 - d. impacts of noise from commercial premises on the intended occupiers of the development;
 - e. where—
 - i. the building is located in a conservation area, and
 - ii. the development involves a change of use of the whole or part of the ground floor,
the impact of that change of use on the character or sustainability of the conservation area;
 - f. the provision of adequate natural light in all habitable rooms of the dwellinghouses;
 - g. the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses; and
 - h. where the development involves the loss of services provided by—
 - i. a registered nursery, or
 - ii. a health centre maintained under section 2 or 3 of the National Health Service Act 2006⁵⁷,
the impact on the local provision of the type of services lost; and
 - i. where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building.

3.1.10 This is discussed below in more detail.

3.2 Transport impacts of the development, particularly to ensure safe site access

3.2.1 The site is located within a highly sustainable location and is less than 280 metres from Reigate railway station which provides services towards Reading, Gatwick Airport and London Victoria.

3.2.2 In addition, frequent bus routes pass the site towards Epsom, Sutton, Guildford and surrounding areas.

3.2.3 The site sits within the centre of Reigate which is accessible by walking and other local areas are accessible by cycling.

3.2.4 In respect of the highways impact, Local Plan Policy TAP1 requires car parking and cycle storage for residential and non-residential development in accordance with adopted local standards.

3.2.5 Annex 4 of the Local Plan shows that:

For residential developments the parking standards are minimum parking standards. The standards are provided as a guide and they may be varied at the discretion of the Council to take into account specific local circumstances.

Type of home	High Accessibility	Medium Accessibility	Low Accessibility
1 bedroom flats	1 space per unit	1 space per unit	1 space per unit
2 bedroom flats	1 space per unit	1 space per unit	2 spaces per unit

3.2.6 The site lies within the 'High Accessibility Zone' and in this regard the parking standards require 21 spaces.

3.2.7 The site provides 15 spaces. However, as discussed in the Local Plan *the standards are provided as a guide and they may be varied at the discretion of the Council to take into account specific local circumstances.*

3.2.8 The Local Plan also states that:

A lower amount of parking may be appropriate in areas within, or adjacent to town centres.

3.2.9 In this regard, the highly sustainable town centre location justifies a lower parking provision and given the proposed flats are studios and one-bedroom units it is likely that car ownership will be lower than average.

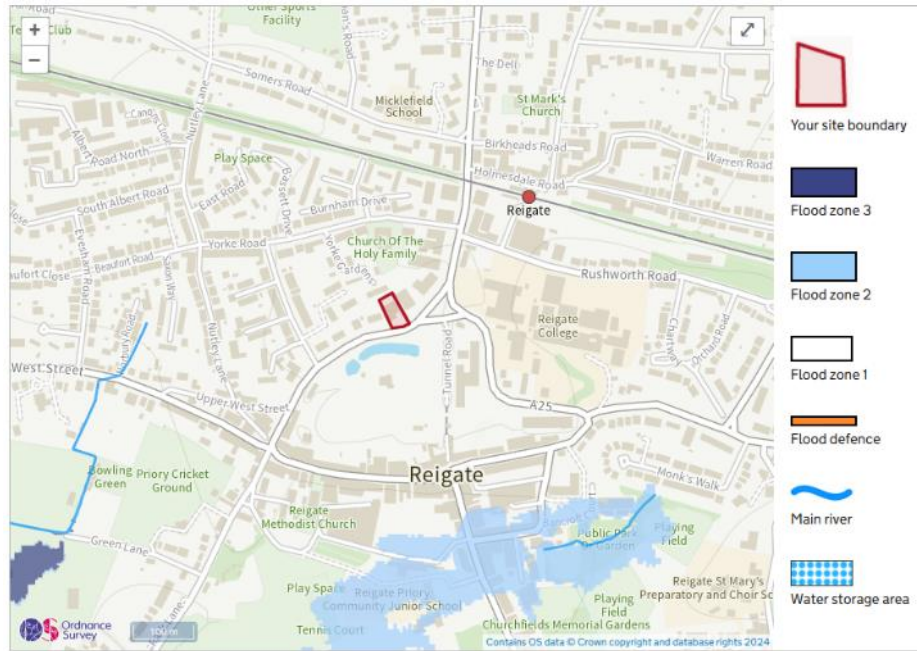
- 3.2.10 Parking restrictions on the main road will prevent any inappropriate on-street parking and visitor parking is available in nearby public car parks.
- 3.2.11 The Cycle Parking Standards confirm that 1 cycle space is required for up to 2-bedrooms. In this regard, the proposed development can incorporate 21 cycle parking spaces and details can be secured by conditions, if necessary.
- 3.2.12 Refuse arrangements will remain as existing and storage can be secured by conditions, if necessary.
- 3.2.13 Paragraph 115 of the NPPF 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.
- 3.2.14 Therefore, in accordance with the NPPF, and the Development Plan the proposed development would not have an adverse impact upon the safety of the highway network in the area, and the prior approval of the Council is therefore not considered necessary.

3.3 Contamination risks in relation to the building

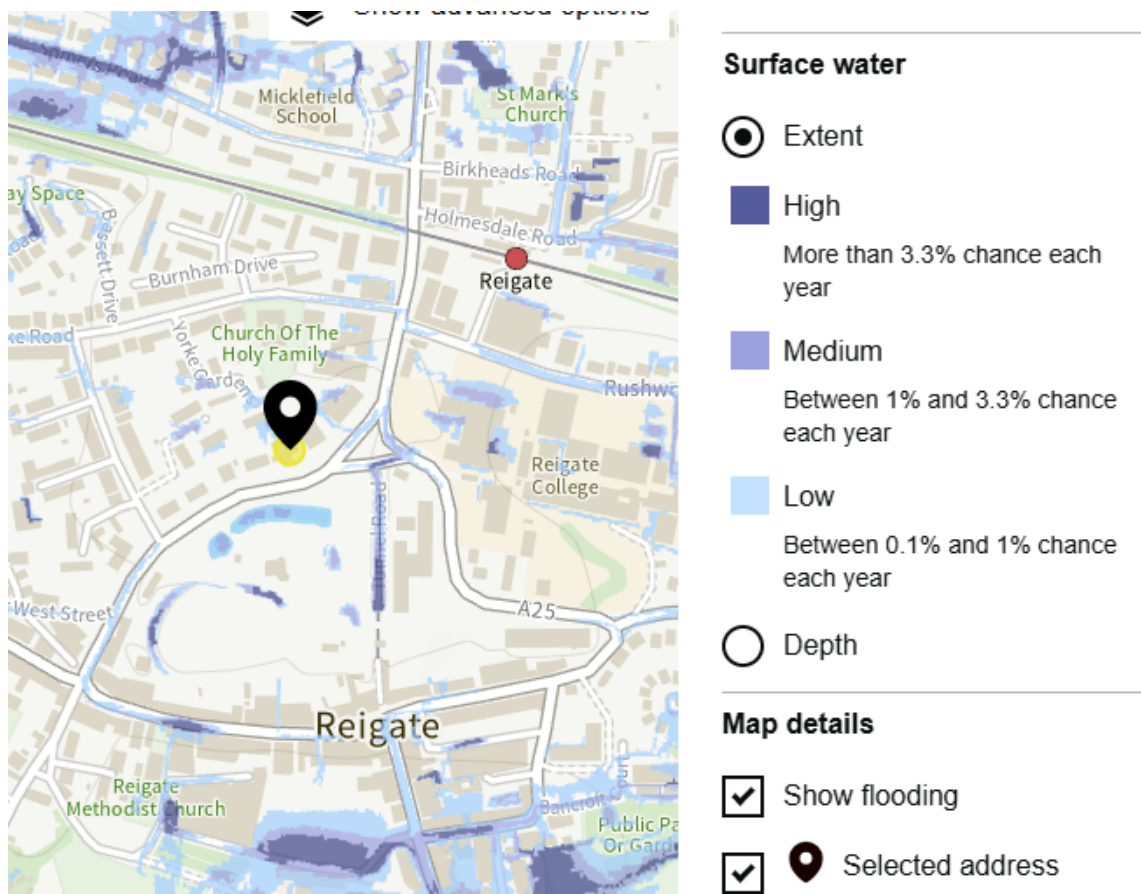
- 3.3.1 The property is located within a previously developed site. The site is not within an area which is identified as an archaeological priority zone and has only been used for office space. Before this it is likely that dwellings existed on the site.
- 3.3.2 Therefore, although no information relating to the contamination risks associated with the site has been submitted in support of this application, the former use of the building and its location in a developed site is such that it is not anticipated that any risk of contamination would be likely to arise during the course of the works.
- 3.3.3 Due to the scale of the development proposed, the limited operational development required, and the utilisation of existing sewer and water supply facilities the requirement for prior approval for contamination risks associated with the site is considered onerous and unnecessary.

3.4 Flooding risks in relation to the building

- 3.4.1 The Environment Agency Flood Map (below) confirms that the site lies within Flood Zone 1.



3.4.2 In addition, the Surface Water Flooding Map shows that the site has a less than low change of surface water flooding.



3.4.3 Therefore, the site is at the lowest risk of flooding and residential use is considered to be appropriate.

3.4.4 Due to the nature of the development within an existing building, the minimal level of operational development required, and its location within an area at low risk of flooding, it is not considered necessary for the Council to require prior approval in relation to flood risk as the development would not conflict with the NPPF or the Technical Guidance in relation to flood risk.

3.5 Impacts of noise from commercial premises on the intended occupiers of the development

3.5.1 The change of use of the building from a use in Class E to a use in Class C3 would not result in any impacts of noise from commercial premises on the intended occupiers of the development as the surrounding uses are not noise generating uses.

3.5.2 It is considered unlikely that the level of noise would be to unacceptable degree. It is likely that any background noise can be mitigated via appropriate sound insulation if necessary.

3.5.3 It is also noted that the application site is close to other residential buildings including dwellings to the north and west of the site adjacent to the business uses.

3.5.4 Therefore, the principle of residential uses in the immediate surroundings has been established.

3.5.5 Therefore, it is not considered necessary for the Council to require prior approval in relation to noise.

3.6 The impact of the change of use on the character or sustainability of the Conservation Area

3.6.1 Class MA states that where the building is located in a conservation area, and the development involves a change of use of the whole or part of the ground floor, an assessment is required on the impact of that change of use on the character or sustainability of the Conservation Area.

3.6.2 The proposed development only involves internal alteration and conversion and a previous application (Ref: 24/00935/F) has previously considered that infill extensions and elevation amendments to create additional window openings. Are acceptable in the context of the Conservation Area.

3.6.3 The proposed development will only be implemented once the works under 24/00935/F have been completed and, in this regard, there will be no change to the appearance of the Conservation Area.

- 3.6.4 The Reigate Conservation Area Appraisal confirms that the special interest of the Reigate Conservation Area is derived from the interrelationship between the format of a traditional and historic market town with High Street, former Castle and former priory and deer park, complemented by the late Georgian Victorian expansion of the town. The predominant character of conservation area buildings is vernacular and Georgian, with Victorian and early 20th century redevelopment and expansion.
- 3.6.5 The Conservatory, the Conservation area appraisal confirms that there is a need to ensure that the cohesiveness of buildings is not eroded by insensitive development.
- 3.6.6 London Road is described as a collection of well-spaced Victorian Villas.
- 3.6.7 The application site is not cited within the Appraisal but it is clear that the significance of the Conservation Area arises from the historic buildings within the area rather than the post war office block which forms the application site.
- 3.6.8 Therefore, the proposed development and the use of the building for residential will not harm the character or appearance of the Conservation Area.

3.7 The provision of adequate natural light in all habitable rooms of the dwellinghouses

- 3.7.1 The requirements applications submitted under Class O of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) are outlined in Paragraph 0.2(e) which requires determination as to whether the prior approval of the authority will be required as to the provision of adequate natural light in all **habitable rooms** of the dwellinghouses.
- 3.7.2 Paragraph W (2A) confirms that where the application relates to prior approval as to adequate natural light, the local planning authority must refuse prior approval if adequate natural light is not provided in all the habitable rooms of the dwellinghouses.
- 3.7.3 Paragraph X confirms that “habitable rooms” means any rooms used or intended to be used for sleeping or living which are not solely used for cooking purposes, but does not include bath or toilet facilities, service rooms, corridors, laundry rooms, hallways or utility rooms.
- 3.7.4 In this respect, for the proposed development it is only necessary to provide adequate natural light to the bedrooms and living room. There are no requirements in Class MA or paragraph W for the submission of a daylight / sunlight assessment to determine if adequate daylight is available to the proposed flats.
- 3.7.5 However, all of the bedrooms and open plan living areas will be served by generously sized, unobstructed windows with as shown on the submitted plans and elevations.
- 3.7.6 Due to the number, size and orientation of the windows, it is considered that all habitable rooms would benefit from adequate natural light,
- 3.7.7 As such, the proposal is acceptable in terms of natural light.

3.8 The impact on intended occupiers of the development of the introduction of residential

- 3.8.1 The surrounding area is mixed use in character, with other residential uses adjacent to the site and also to the rear and above other commercial uses in Broadwater Street West.
- 3.8.2 The area is not considered to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses. Therefore, the proposed conversion to residential flats would be highly appropriate and not result in any detrimental impacts on any employment or retail locations.

3.9 The impact on the local provision of the type of services lost

- 3.9.1 Class MA.2(h) states that where the development involves the loss of services provided by (i) a registered nursery, or (ii) a health centre maintained under section 2 or 3 of the National Health Service Act 200657, an assessment of the impact on the local provision of the type of services lost is required.
- 3.9.2 The current use is not a registered nursery or health centre. Therefore MA.2(h) is not relevant in this instance.

3.10 The fire safety impacts on the intended occupants of the building

- 3.10.1 Like the majority of properties on this part of London Road, there is a large off-street area for access for a Fire Appliance. This would be the same as the current situation. In addition, this vehicular access extends to the rear so that the whole building would be accessible to emergency vehicles.
- 3.10.2 The evacuation assembly point for the property can be within the car parking area or the Castle Grounds opposite the site.
- 3.10.3 The distance between a fire service vehicle and the furthest point within the dwellings will be under 20m for all dwellings.
- 3.10.4 The proposed scheme will use the same access arrangements to that found currently. The proposed dwellings can be fitted with interlinked, mains operated with battery backup fire and smoke and heat alarms of a minimum Grade D2 Category LD3 standard, as required by the Building Regulations, as well as carbon dioxide alarms where necessary.
- 3.10.5 To minimise the risk of fire spread the internal hallway walls and doors forming an escape route will have a minimum fire rating of 30 minutes fire-resistant construction in accordance with the Building Regulations.
- 3.10.6 In addition, the site is within 1km Reigate Fire Station and therefore any response would be rapid in an emergency.

3.10.7 Therefore, there are no fire safety impacts which would prevent the granting of permission.

3.11 Development Plan and NPPF

3.11.1 The Development Plan Policies Map confirms that the site lies within the Reigate Town Centre boundary and is also within the Reigate Conservation Area. However, this designation does not preclude an application for prior approval.

3.11.2 The National Planning Policy Framework (NPPF) confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. *The development clearly falls into the category of sustainable development providing much needed housing in an area of housing need, on brownfield land and re-using part of an existing redundant building.*

3.11.3 Paragraph 8 of the NPPF confirms that the planning system is expected to perform an economic, social and environmental role in contributing to the achievement of sustainable development. *In this case the development will assist in performing a social role by providing more housing on a brownfield site and will contribute to the pursuit of sustainable development by widening the choice of high-quality homes in an area where the quality of the built, natural and historic environment will be unharmed.*

3.11.4 Another core planning principle is to take account of the different roles and character of different areas, including promoting the vitality of the main urban areas, protecting Green Belts and recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.

3.11.5 *The proposal will assist in promoting the vitality of the area through the introduction of housing. The site is not located within an area of any designated status which would preclude consideration of a prior approval application.*

3.11.6 A further core principle is the encouragement to make effective use of brownfield land. *The site constitutes brownfield land.*

3.11.7 A further core planning principle is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. *The proposal does not impact any designated historic assets as the appearance of the building is unchanged.*

3.11.8 A further core planning principle is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable. *The proposal does not constitute a significant development and therefore transport impacts will be minimal.*

3.11.9 Section 9 promotes sustainable transport. *The application proposal is in an area which is accessible by public transport and cycling.*

- 3.11.10 Paragraph 135 states that planning policies and 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; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; 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);
- 3.11.11 *No external changes are proposed or required and therefore the existing appearance will be maintained.*
- 3.11.12 Paragraph 11 confirms that LPAs should apply the presumption in favour of sustainable development. *The proposal represents a form of highly sustainable development and therefore is supported by this presumption.*
- 3.11.13 In summary, this statement has considered the proposal in the context of the NPPF and confirms that it is entirely consistent with the Government planning policy.

4 Summary and Conclusion

4.1.1 Having considered the proposed development in relation to the criteria prescribed within the GPDO, it is concluded that:

- Prior approval in relation to transport and highways impact is not required.
- Prior approval in relation to contamination risk of the building is not required.
- Prior approval in relation to flooding risk of the development is not required.
- Prior approval in relation to noise impact is not required.
- Prior approval in relation to the impact on the Conservation Area is not required.
- The proposed habitable rooms will all receive adequate daylight and therefore prior approval is not required in this regard.
- There is no impact on any employment land and therefore prior approval is not required in this regard.
- There is no impact on any local services therefore prior approval is not required in this regard.
- Prior Approval is not required in respect of fire safety.

4.1.2 In addition:

- the building is not:
 - on article 1(5) land;
 - in a site of special scientific interest;
 - in a safety hazard area;
 - in a military explosives storage area;
 - a listed building; or
 - a scheduled monument.

4.1.3 From the submitted it is concluded that there are no reasons why prior approval cannot be granted and the proposed change of use to C3 can proceed subject to a condition for prior implementation of application 24/00935/F to ensure the elevations provide the relevant fenestration.

Jeremy Butterworth BSc (Hons) MA MRTPI

November 2024



J Butterworth Planning Limited

71-75 Shelton Street

London, WC2H 9JQ

jeremy@jbutterworthplanning.co.uk

[**jbutterworthplanning.co.uk**](http://jbutterworthplanning.co.uk)