



Delegated Report

Householder Planning Application

Planning Application No: 20230201

Location: Buildings To The North Of Hill Farm Taylors Lane Higham

Description: Application to determine if prior approval is required for the change of use for existing agricultural storage buildings, including the insertion of windows, glazed doors, first floors and roof lights to ensure all habitable rooms are naturally lit.

Applicant: Mr Richard Batchelor

Site Visit Date: 27/03/23

Submitted Documents/Plans

Application Form
22-36-01 – Location Plan
22—36-02 – Site Layout Plans, Existing and Proposed
22-36-03 – Building Plans as Existing
22-36-04 – Elevations as Existing
22-36-05 – Building Plans as Proposed
22-36-06 – Elevations as Proposed
Access Appraisal
Planning and Design Statement

Relevant Planning History

Reference	Description	Decision	Decision Date
20070347	Change use of agricultural building to a garage with storage in the roof space.	PER	27.06.2007
20060072	Demolition of lean-to extension and erection of two storey extension on the west (rear) elevation to form boot room, covered porch and garden room at ground floor level with two enlarged bedrooms at first floor level.	PER	22.03.2006

Development Plan

The application stands to be assessed under the terms of Part 3 Class Q of the Town and Country (General Permitted Development) (England) Order 2015 (as amended) to determine whether the proposed change of use and building operations are permitted development or not. Adopted planning policy is therefore not necessarily a relevant consideration.

In determining the application the legislation does require the Local Planning Authority to have regard to the National Planning Policy Framework so far as relevant to the subject matter of the prior approval, as if the application were a planning application.

Consultations, Publicity and Representations

Consultees

Ward Councillor: Objection received.

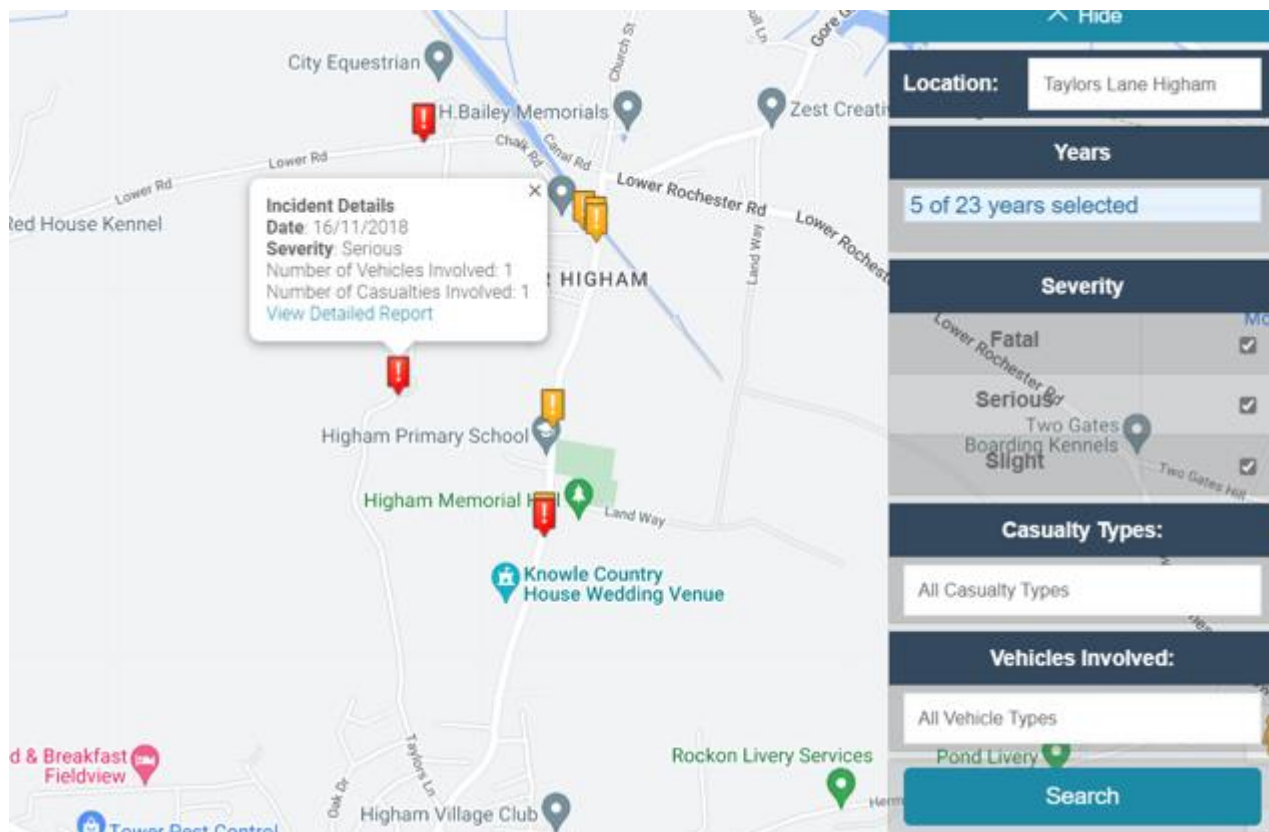
KCC Highways: The comments noted that the proposal does not meet the criteria to warrant involvement from the Highway Authority. They did however, request inclusion of an informative.

GBC Highways:

This is a complex proposal and requires careful consideration.

1. Traffic generation from three properties cannot be considered significant, even with Taylors Lane being a single track highway, experience at another site suggest the Planning Inspectorate would not consider this as a sustainable ground for refusal. Paragraph 111 of the National Planning Policy Framework states.
“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.”
There is also the issue of the traffic generation of any previous use of the building which the Access Appraisal states as light industrial unit. So there would be no objection on traffic generation in highway terms.
2. Car parking, two spaces per property is currently considered adequate, for a three or four bedroom property, although Kent County Council have a draft proposal to increase the requirement to three spaces for each four or more bedroom property in a rural area.
<http://kentdg.wpengine.com/wp-content/uploads/2021/11/Parking-Standards-Guidance-Kent-Design-Guide-V1.0.pdf>. In addition 0.2 of a parking space is required per property, this increases the parking requirement by one space rounding 0.6 to 1 space. The car parking provision is, therefore deemed inadequate. I also not the red line does not include the access to the properties or their parking provision and so no access exists as presented, nor is there space to provide surface water or potentially foul drainage if cesspools are required.
3. Cycle parking to comply with the requirements of SPG4 should be one space per bedroom, no such provision appears to have been made.
4. Sight line drawings are inadequate the sight line continues beyond the limit of the drawing. No details have been provided for the justification of the chosen sight line of 59 metres which Manual for Streets suggests is appropriate for 60kph (approximately 37mph), whilst Taylors Lane is a derestricted highway and so subject to a 60mph speed limit, although it is doubtful vehicles will necessarily be travelling at this speed. It must also be taken into account that the access is existing and been in previous use.

Looking at the crashmap data for the last five available years, there was only one accident in Taylors Lane in 2018 and this only involved a single vehicle. Recent accidents will not be on the data base as there is a delay in recording the event and only injury accidents are recorded.



5. No information on how foul or surface water drainage will be disposed of. There is limited space on site for any foul drainage provision, which suggests unless a foul sewer is available it would have to be via a cesspool installation and surface water if disposed of by soakaways should be 5 metres minimum from any highway or building to comply with Building regulations. A cesspool installation would be a significant engineering operation as for each single cesspool, a minimum capacity of 18,000 litres is required for the first two uses, followed by an additional 6,800 litres for each additional person. Shared cesspools can lead to issues regarding costs and frequency of emptying, so individual cesspools should ideally be provided for each dwelling.

<https://www.gov.uk/permits-you-need-for-septic-tanks/you-have-a-cesspool>

Building Regulations gives the following requirements regarding cesspools,

Cesspools

Siting

1.58 The site of the cesspool should preferably be on ground sloping away from and sited lower than any existing building in the immediate vicinity.

1.59 Cesspools should be sited at least 7m from any habitable parts of buildings and preferably downslope.

1.60 Cesspools should be sited within 30m of a vehicle access and at such levels that they can be emptied and cleaned without hazard to the building occupants or the contents being taken through a dwelling or place of work. Access may be through a covered space which may be lockable.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/442889/BR_PDF_AD_H_2015.pdf

If a cesspool or cesspools are to be provided, suitable provision should be made for parking a tanker clear of the highway without obstructing access to the parking spaces.

Other forms of drainage may have their own requirements and may extend outside the red line.

As presented, I consider the application to be flawed.

- (a) Red line does not extend to the highway
- (b) Sight line drawing inadequate and lacks justification for the chosen sight line provision. Sight line should be clear of any obstructions that restrict view of approaching traffic.
- (c) No details provided regarding foul and surface water drainage with very limited space to provide suitable solutions.
- (d) Inadequate motorised vehicle parking and no cycle parking

GBC Environmental Protection:

No objection to this application, but I would make the following comments.

As with any site that has been in agricultural use, there is the potential for contamination to be present due to the use of pesticides and fertilisers etc and also fuel/oil storage or in association with machinery repair. No details regarding current or past use have been provided. In view of this, a risk based contamination assessment will be required. The presence of any asbestos containing materials should also be included in this.

In order to address this and other matters the following conditions and informatives are recommended.

Land Contamination:

No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the CLEA guidelines and CLR 11 methodology) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.

- a) The contaminated land assessment shall include a desk study to be submitted to the Local Planning Authority for approval. The desk study shall detail the history of the site uses and propose a site investigation strategy based on the relevant information discovered by the desk study. The strategy shall be approved by the Local Planning Authority prior to investigations commencing on site.
- b) The site investigation, including relevant soil, soil gas, surface and groundwater sampling, shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.
- c) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.
- d) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority.

e) Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.

f) Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the local planning authority.

Following completion of the measures identified in that scheme, and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the local planning authority.

Code of Practice on Construction and Demolition:

Please apply as appropriate to minimise any impact on neighbouring premises during the construction.

Drainage/sewerage informative:

The foul sewage shall be removed by means of the mains drainage system and not by the use of non-mains sewerage systems, unless connection to the drainage system is not reasonably practicable. If foul sewage is to be removed using non-mains sewerage systems, a sewage treatment plant or septic tank system will be considered in preference to a cesspool. Such a system may require the prior consent of the Environment Agency under the terms of the Water Resources Act 1991. Applicants are therefore advised to discuss their requirements with the Environment Agency at the earliest opportunity. It should be ensured that the septic tank or cesspool is of adequate capacity to serve the proposed development and suitable access and hardstanding area shall be maintained to it on site.

Lighting

Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install external lighting that illuminate anything other than the ground within the curtilage of the new properties in order to assist in preventing a nuisance from occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated).

Neighbouring properties

A site notice was placed by 10th March. A member of the public reported that it had fallen away in high winds on 14th March and this site notice was replaced.

5 comments of objection were received from members of the public. Summary of objections are as follows:

- Small parcel of land to accommodate adequate personal space and parking.
- The road is dangerous and additional pressure would worsen the situation.
- Parking for 6 vehicles would not be adequate for dwellings of 3 or 4 bedrooms.
- Query regarding cherry tree removal to accommodate development.
- Development would lead to a precedent of development in the Green Belt and Archaeological potential land.
- No drainage provision on Taylors Lane meaning all properties require pump assisted domestic drainage and in some instances cesspits.
- Significant loss of privacy
- Increased pollution, noise and light disruption.
- Impact/overlook on small business nearby
- Harm to landscape and protected wildlife.

Officer's Analysis

Site Description

This site relates to a detached agricultural building which appears to have fallen into some disrepair and is particularly overgrown at the rear. The building has a total length of 37.7m and width of 12.1m. Access is currently gained by an informal track stemming from Taylors Lane.

Photos of the building taken during the site visit are shown below for clarity.





Discussion

This assessment concentrates on whether the prior approval of the Local Planning Authority is required in respect of the following matters.

- Transport and highways impacts of the development;
- Noise impacts of the development;
- Contamination risks on the site;
- Flooding risks on the site; and
- Whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from agricultural use to a dwelling house
- The design and external appearance of the building
- The provision of adequate natural light in all habitable rooms of the dwellinghouses

As advised in legislation, when determining such an application the Local Planning Authority shall take into account any representations made to them and have regard to the National Planning Policy Framework so far as relevant to the subject matter of the prior approval, as if the application were a planning application.

However, whilst this submission does not comprise a Lawful Development Certificate application, the legislation advises that the Local Planning Authority may refuse an application for prior approval if the development does not comply with any conditions, limitations or restrictions specified in the relevant class. It is therefore proposed to consider first whether the proposed development complies with other limitations attached to the permitted change of use, before assessing the prior approval matters. If there are any obvious breaches that automatically trigger the requirement for planning permission, the prior approval matters will not need to be assessed.

Class Q Assessment

Class Q sets out that the following change of use and building operations are permitted development:

Q. Development consisting of—

(a) a change of use of a building and any land within its curtilage from a use as an agricultural building to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order; or

(b) development referred to in paragraph (a) together with building operations reasonably necessary to convert the building referred to in paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule.

Class X of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) defines the terminology used in Class Q, as follows:

- *An “agricultural building” means a building (excluding a dwellinghouse) used for agriculture and which is so used for the purposes of a trade or business;*
- *The term “agricultural use” refers to such uses.*
- *“Curtilage” means or the purposes of Class Q, R or S only—*
 - (a) the piece of land, whether enclosed or unenclosed, immediately beside or around the agricultural building, closely associated with and serving the purposes of the agricultural building, or*
 - (b) an area of land immediately beside or around the agricultural building no larger than the land area occupied by the agricultural building, whichever is the lesser;*

This permitted change is subject to a number of limitations, which are listed in the table below alongside an assessment of whether the proposal accords with these limitations.

Criteria Q1
a) the site was not used solely for an agricultural use as part of an established agricultural unit— (i) on 20th March 2013, or (ii) in the case of a building which was in use before that date but was not in use on that date, when it was last in use, or (iii) in the case of a site which was brought into use after 20th March 2013, for a period of at least 10 years before the date development under Class Q begins; <u>Response</u> The key with this limitation, given that the building exists, is how the building was used on 20 March 2013. On this date the site must have been used solely for an agricultural use as part of an established agricultural unit (Q1 (a)(i)) or if it wasn't in such a use, when it was last used for that purpose (Q1 (a)(ii)) Application reference 20070347 received in 2007 for neighbouring plot indicated the buildings referred to in this application as 'farm buildings'. And so, it was at this time the established use of the buildings. No other nearby planning applications surrounding this building have been received since this time. Therefore it appears that on 20th March 2013, the buildings were in all likelihood used solely for agricultural purposes. The proposal complies with the relevant criteria of Q1 (a)
(b) in the case of— (i) a larger dwellinghouse, within an established agricultural unit— (aa) the cumulative number of separate larger dwellinghouses developed under Class Q exceeds 3; or (bb) the cumulative floor space of the existing building or buildings changing use to a larger dwellinghouse or dwellinghouses under Class Q exceeds 465 square metres; <u>Response</u> The existing dwelling and the proposed dwelling would not exceed 3 larger dwellinghouse units. Floor Spaces: Plot 1: 101m² Plot 2: 106m² Plot 3: 170m² The cumulative floor area of the building (measured externally) is 320m² and therefore it does not exceed 450m²
(ba) the floor space of any dwellinghouse developed under Class Q having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order exceeds 465 square metres;]

Response

The cumulative floor area of the building (measured externally) is 320m² and therefore it does not exceed 450m²

(c) in the case of—

(i) a smaller dwellinghouse, within an established agricultural unit—

(aa) the cumulative number of separate smaller dwellinghouses developed under Class Q exceeds 5; or

(bb) the floor space of any one separate smaller dwellinghouse having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order exceeds 100 square metres;

Response

The existing dwelling and the proposed dwelling would not exceed larger dwellinghouse 3 units, complying with part b.

(d) the development under Class Q (together with any previous development under Class Q) within an established agricultural unit would result in either or both of the following—

(i) a larger dwellinghouse or larger dwellinghouses having more than 465 square metres of floor space having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order;

(ii) the cumulative number of separate dwellinghouses having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order exceeding 5;

Response

There are 3 proposed larger dwellinghouse units, none of which exceed a floor space of 465m².

(e) the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained;

Response

According to the application form no agricultural tenancy exists over the site

(f) less than 1 year before the date development begins—

(i) an agricultural tenancy over the site has been terminated, and

(ii) the termination was for the purpose of carrying out development under Class Q, unless both the landlord and the tenant have agreed in writing

that the site is no longer required for agricultural use;

Response

According to the application form no agricultural tenancy over the site has been terminated a year before this development is proposed.

(g) development under Class A(a) or Class B(a) of Part 6 of this Schedule (agricultural buildings and operations) has been carried out on the established agricultural unit—

(i) since 20th March 2013; or

(ii) where development under Class Q begins after 20th March 2023, during the period which is 10 years before the date development under Class Q begins;

Response

No development under Class A(a) or Class B(a) or part 6 (agricultural buildings and operations) has been carried out on the agricultural unit.

(h) the development would result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point;

Response

The development does not involve the external dimensions of the building extending beyond the external dimensions of the existing building.

(i) the development under Class Q(b) would consist of building operations other than—

(i) the installation or replacement of—

(aa) windows, doors, roofs, or exterior walls, or

(bb) water, drainage, electricity, gas or other services,

to the extent reasonably necessary for the building to function as a dwellinghouse; and

(ii) partial demolition to the extent reasonably necessary to carry out building operations allowed by paragraph Q.1(i)(i);

Response

The GPDO does not include any interpretation on what is considered to be the extent of building operations reasonably necessary for the building to function as a dwellinghouse, or the extent of demolition reasonably necessary to carry out building operations.

However paragraph 105 of the National Planning Practice Guidance (Reference ID: 13-105-20180615) does provide advice on what works are permitted under the Class Q permitted development right for change of use from an agricultural building to residential use. It says:

The right assumes that the agricultural building is capable of functioning as a dwelling. The right permits operations which are reasonably necessary to convert the building, which may

include those which would affect the external appearance of the building and would otherwise require planning permission. This includes the installation or replacement of windows, doors, roofs, exterior walls, water, drainage, electricity, gas or other services to the extent reasonably necessary for the building to function as a dwelling house; and partial demolition to the extent reasonably necessary to carry out these building operations. It is not the intention of the permitted development right to allow rebuilding work which would go beyond what is reasonably necessary for the conversion of the building to residential use. Therefore it is only where the existing building is already suitable for conversion to residential use that the building would be considered to have the permitted development right.

There is also case law that can be referred to. The leading high court case of *Hibbitt and another v Secretary of State for Communities and Local Government* (1) and *Rushcliffe Borough Council* (2) [2016] EWHC 2853 (Admin) has established that there is a clear distinction between conversion and rebuilding and in applying the principles of this judgment.

The Courts held that the Inspector's analysis in dismissing an appeal against the refusal of a planning authority to grant prior approval to a proposed development was correct and the application to quash the decision did not succeed.

The building in question in that case was a 30 metre, steel framed barn largely open on three sides with a monopitch roof, a concrete floor slab and six steel uprights which span to support a corrugated fibre roof.

In order to convert the barn into a dwelling the existing steel frame and roof would be retained. No demolition was proposed. Panels were proposed for the four external walls and a ceiling within the existing frame.

The planning appeal was dismissed, the Inspector considered that the agricultural building would not be capable of functioning as a dwelling without substantial building works, including the construction of all four exterior walls. The proposed works went "well beyond what could reasonably be described as conversion". Effectively it was a new building, except for a limited amount of the existing building.

The Inspector stated her view that the simple fact that the existing barn was sufficient to bear the load of the proposed development was not, in and of itself, sufficient to meet the requirements of part Q. They stated:

Nevertheless, having regard to the extent of works necessary for the frame and fibre roof to function as a dwelling, a demonstration of the load bearing capacity of the frame alone is insufficient to meet the requirement of part Q in this case. Although I accept that substantial works could fall under the scope of class Q they nonetheless presuppose that the works comprise 'conversion'. In this case, the building before me would not be capable of functioning as a dwelling without the building works outlined above which include the construction of all four exterior walls. This goes well beyond what could reasonably described as conversion, and notwithstanding the re-use of the 6 steel uprights as the main structural element for the building and the retention of the fibre roof, the works described would be so extensive as to comprise rebuilding. I must therefore conclude that the works necessary to create a dwelling from the structure onsite would not fall within the scope of that permissible under part Q. Accordingly, they would not be permitted development under Class Q(b).

Each application is considered and assessed on a case by case basis having regard to the NPPG advice and case law but ultimately building operations and demolition that result in a building of a different size and form would exceed the works reasonably necessary to convert the building, and therefore would not meet the provisions of the GPDO. As an example of basic guidance a scheme might not comply where the following applies:

- Substantial reconstruction;
- Where the existing structure requires strengthening to enable the safe conversion of the building;
- the replacement of the roof where that requires the strengthening of the existing structure;
- Having regard to *Hibbitt v Secretary of State for Communities and Local Government* [2016], the construction of walls to enclose a largely open sided building (e.g. a Dutch or pole barn);
- Internal walls that provide lateral stability, strengthen the existing structure or take any load from the roof or other parts of the building;
- Provision of internal structures to support new window and door openings;
- Development extending beyond the existing building's envelope;
- Provision of external features such as chimneys, flues, external cladding that extends beyond the existing envelope;

Note: This is not exhaustive

The details submitted with the application show that the extent of the works to be carried out to the building may fall within the above limitations. However, the applicant has not provided a structural appraisal or a construction method to demonstrate that the building is structurally sound and capable of functioning as a dwelling and that the extent of the works required to convert the building would not include the construction of new structural elements.

In the absence of a structural appraisal and construction method statement undertaken by a suitably qualified engineer, it is not possible to confirm that the proposed building operations shown on the submitted drawing reflect the actual extent of works required to the building.

It is noted also that the existing plans do not show areas of disrepair. On site it was possible to see some areas of disrepair, overgrowth and walls covered with corrugated sheeting. It is also not clear whether the roof would need to be replaced and also if so whether it would require structural support. Without the adequate surveys and construction details, it is not possible to fully understand the extent of works required to the building and whether this would be reasonably defined as 'conversion'. Some images are shown below for reference:







As such the proposal is not considered to meet the limitations set out in Q1 (i).i

(j) the site is on article 2(3) land;

Response

The site is not on Article 2 (3) land

(k) the site is, or forms part of—

- (i) a site of special scientific interest;**
- (ii) a safety hazard area;**
- (iii) a military explosives storage area;**

Response

The site is not part of a SSSI, a safety hazard zone, a military explosives storage area

(l) the site is, or contains, a scheduled monument;

Response

The site is and does not contain a scheduled ancient monument

(m) the building is a listed building.

Response

The building is not listed.

Class Q.2 (1) Conditions and Prior Approval Assessment

For a Class Q application, the following matters are for Prior Approval:

- (a) Transport and highways impacts of the development
- (b) Noise impacts of the development
- (c) Contamination risks on the site
- (d) Flooding risks on the site
- (e) Whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from agricultural use to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order
- (f) The design or external appearance of the building, and
- (g) The provision of adequate natural light in all habitable rooms of the dwellinghouses,

and the provisions of paragraph W (prior approval) of this Part apply in relation to that application.

Part W requires (amongst other things) the Local Planning Authority to take into account any representations made to them as a result of any consultation and in response to a site notice and have regard to the National Planning Policy Framework (NPPF) 2021, so far as relevant to the subject matter of the prior approval, as if the application were a planning application.

In terms of the Local Planning Authority's assessment in relation to the above matters for prior approval, and notwithstanding the assessment under Class Q1 above, the following comments are made:

Thames Estuary and Marshes Ramsar / Special Protection Area (SPA)

In addition to the criteria of Class Q, the development is subject to Regulations 73 to 76 of the Conservation of Habitats and Species Regulations 2010 (as amended) which requires the Authority to take into account whether it would either alone or in combination have likely significant effects on a European Site (SPA/SAC/Ramsar site). Regulation 73 (1) of the Habitat Regulations states: "It is a condition of any planning permission granted by a general development order....that development which is likely to have a significant effect on a European site... (either alone or in combination with other plans or projects)... must not be begun until the developer has received written notification of the approval of the local planning authority under regulation 75."

The proposed development is considered to have likely in-combination effects due to its recreational impacts. Thus, any successful application would need to satisfy the requirements of the Habitat Regulations and would require a financial contribution of £253.83 per dwelling.

An informative to this effect will be added to the decision notice in the event of the application being supported which would state the following.

It is a condition of any permission granted by a general development order that, in those cases where a development is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, the development must not be begun until the developer has received written notification of the approval of the local planning authority under Regulation 73, of the Conservation of Habitats and Species Regulations 2010, which is expressly saved by Schedule 7 of the Conservation of Habitats and Species Regulations 2017. Pursuant to Article 3(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015, an application under Regulation 73 would therefore be required before development is begun.

Conclusion & Recommendation

The proposed development does not fall within the definition of permitted development set out in Schedule 2, Part 3, Class Q (b) of the Town and Country Planning (General Permitted Development) (England) Order

2015 (as amended), as follows:

(a) Insufficient information has been submitted with the application to demonstrate that the extent of the works required to facilitate the change of use of the building to a dwelling do not extend beyond the limitations set out in Q.1 (i) (i) and (ii) and would not include the construction of new structural elements.

Consequently, the development cannot utilise the Prior Approval procedure in this context. As such prior approval is required and refused.

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Lisa Williams	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	27th April 2023	Dated:	27 April 2023