

DESIGN AND ACCESS STATEMENT

19 Lemon Street, Truro, Cornwall, TR1 2LS



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TABLE OF CONTENTS

1.	EXECUTIVE SUMMARY	3
2.	INTRODUCTION	6
3.	LOCATION	7
4.	PROPOSAL	9
5.	PLANNING POLICY	13
6.	PLANNING APPRAISAL	17
7.	SUSTAINABILITY	23
8.	GREEN INFRASTRUCTURE PLAN	23
9.	CONCLUSION	25

1. EXECUTIVE SUMMARY

- 1.1. No. 19 Lemon Street is a Grade II Listed property located on the right hand side and lower section of this iconic street, close to the City Centre. The original use of the property was a 'town house' as detailed within the Listing description constructed in circa 1799.
- 1.2. The primary intention of this application is to return the property to its original residential status, which is the best and most sympathetic use of this historic building, with minimal alterations and loss of fabric, and the proposed works and conversion will ensure its survival and maintenance long into the 21st Century.
- 1.3. This proposal relates to the change of use and associated internal alterations from Class E to Class C3, to convert the property back to a residential property. The proposal to return the building to its original intended use is not unreasonable given its residential character and proportions; subsequently there will be a neutral impact on architectural integrity and historic fabric.
- 1.4. The property lies outside of the Primary Shopping Area but within the Town Centre boundary.
- 1.5. No. 19 Lemon Street will be laid out over 3 floors plus the basement, to provide a self-contained flat within the basement and dwelling house throughout the main building comprising kitchen / dining room and lounge on the ground floor, 3 No bedrooms with one ensuite and family shower room and WC on the first floor and 2 No bedrooms, two en-suites and separate shower room on the second floor.
- 1.6. Cornwall Council Planning policy over the last 30 years has lead to significant numbers of out of centre shopping and modern office accommodation. The COVID pandemic has also resulted in a massive increase in working from home. The full return of employees to offices has not returned to pre-pandemic levels and it is likely the demand for office space will never return to these levels. The combined effects of Cornwall planning policy and massively and prolonged working from home as a result of COVID has significantly reduced the demand for both retail and office accommodation in Truro City centre. It is noted there are currently many vacant commercial properties within Truro City Centre.
- 1.7. The outdated facilities, poor access (externally and internally) and cheaper, modern offices at out of centre locations around Truro and further a field such as Tolvaddon, with quicker transport routes to the A30, on site parking and up to 50% cheaper rents and business rates, are unsurprisingly much more attractive to businesses. We are aware of another long established business that has surrendered their lease on offices in Lower Lemon Street and relocating to Threemilestone for exactly these reasons.
- 1.8. The existing building is in a structurally sound condition and capable of alteration, although upgrading of the fabric and services will be required in order to meet current Building Regulations. The overall footprint and elevations openings will remain unchanged.

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- 1.9. The introduction of the new Class MA as Permitted Development provides a pathway for creating residential properties from business premises without a formal Planning Application, although it does not apply to Listed Buildings in order to protect the character and appearance of Listed Buildings. Notwithstanding the above, National Government intentions to support this change of use are clear. Consideration has been given to Planning Policy including the NPPF 2019, Cornwall Local Plan and the Truro & Kenwyn Neighbourhood Plan in developing the proposal. Policy 5 of the Cornwall Local Plan Adopted November 2016 states that: *“Proposals that would result in the loss of business space must: i) demonstrate there is no market demand through active and continued marketing for at least a period of 9 months..... iv) be unsuitable to continue as business use due to environmental considerations”*
- 1.10. The building is currently vacant. Local Commercial Agents have confirmed there is now little interest in this size and type of building for commercial use.
- 1.11. Cornwall Council has approved conversions of traditional buildings from business use to residential: former solicitors offices at 33-34 Lemon Street Ref: PA22/01853, former Walker Crips Investment management at 65 Lemon Street Ref: PA22/07145, former hairdressers at 28 Lemon Street, Ref: PA20/08276 which is within Primary Shopping Area and Town Centre boundary, and former offices at 5 Upper Lemon Villas, Ref: PA20/07469 have been approved without the application of Policy 5 and therefore precedent has been set by Cornwall Council on previously determined applications with the planning officers advice as follows:

*PA20/02532 - Proposed conversion and reinstatement of existing building into a single dwelling
5 Upper Lemon Villas, Lander House Lemon Street Truro TR1 2PD*

Principle:

Policy 5 of the Cornwall Local Plan requires proposals that would result in the loss of business space to, amongst other things, demonstrate there is no market demand through active and continued marketing for at least a period of 9 months. Whilst this information has not been submitted, this unit is situated outside the defined limits of Truro City Centre and outside the nucleus of the central shopping area.

Although this would usually not be satisfactory to satisfy the requirements of policy 5, the planning history of the site weighs in its favour given its original use. The proposal is returning the building to its former use and it is not considered unreasonable given its residential character, with surrounding buildings being primarily in residential use.

Conclusion:

Taking these factors into account, on balance it is considered that the proposal is acceptable, subject to conditions. All other matters raised have been taken into account, including the planning history and the comments of the City Council, but none is of such significance as to outweigh the considerations that have led to the conclusion.

- 1.12. As a Listed Building, careful consideration has been given to the proposed design and internal layout in order to minimise disruption or loss to the fabric, whilst enabling an ergonomic layout suited to 21st Century living. Therefore we believe the principle of the proposal to revert the building to its original residential use is acceptable.

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- 1.13. The Heritage Impact Assessment follows the design concept as it has evolved and avoided harming the aesthetic and evidential value of the building and the proposed solutions to the internal arrangements are acceptable. The proposal will instil a viable, original use to the building and will enhance the heritage assets and their setting.
 - 1.14. In general, Planning Policy supports the nature and spirit of the proposal being submitted including Design, Best Use of Land and Existing Buildings and Transport & Accessibility.
 - 1.15. We advise Cornwall Council Policy supports the conversion for 3 reasons: firstly there is a shortage of residential space in Truro and Cornwall, secondly the building was constructed as a residential building and should be used as such and thirdly the use of the building as a residential property will return the use of the building to the original intended use and has no adverse implications on the character of the area. In addition, Truro needs to have a more residential focus in the town centre for environmental reasons, people can walk to the stores and it helps revitalise Truro's raison d'être.
 - 1.16. The demand for office space in and around Truro is muted. The demand for outdated office space in unsuitable traditional buildings is very low due to Cornwall Council planning policy and the working from home culture as a result of COVID. Cornwall Council has not applied Policy 5 on other applications to convert offices back to their former use, and by doing so the Council is applying the spirit of National Planning Policy and taking a pragmatic and common sense approach, otherwise these important historic and listed buildings would have a period of 9 months where they would be subject to a lack of maintenance, moisture ingress and deterioration and decay.
 - 1.17. Therefore we believe Cornwall Council has set the precedent that should be applied to this conversion and the application should be approved.

2. INTRODUCTION

- 2.1. This Design & Access statement details the key design considerations relating to the proposed change of use and conversion of this Listed Building from Class E (Commercial, Business and Service) to Class C3(a) (Dwelling-house for single person or family occupation).
- 2.2. No. 19 Lemon Street is Grade II Listed (List Entry No. 1205574), subsequently a Listed Building Consent application has been made to Cornwall Council. A Historic Impact Assessment also accompanies this Application.
- 2.3. The property is traditionally constructed with a granite ashlar basement, local freestone ashlar above with continuous C20 roof dormer behind parapet and asbestos slate roof with brick end stacks, 2-window range front, round-headed doorway with projecting ashlar pilasters and moulded cornice, 6 panel door and spoken fanlight over. Metal railing (included within the listing) bedded into granite on the front elevation delineates the boundary and provides access via granite steps to the basement. Granite steps and walkway forms access to the front entrance door.
- 2.4. The rear elevation is rendered at low level with natural slate hanging above. The 2nd floor extension is formed by a large dormer which is rendered.
- 2.5. The property was constructed c.1799 as a 'town house' as detailed within the Historic England Listing.
- 2.6. No records of previous Planning or Listed Building Consent Applications can be seen on the Cornwall Council Planning Portal, however we are aware that alterations have been undertaken with regards to the roof space / provision of Second Floor accommodation, which we understand were undertaken c. 1980s.
- 2.7. Internally, some of the original features have been lost with previous alterations and adaptations, however examples of mouldings around door openings, some lath and plaster ceilings remain plus isolated areas of cornice and skirtings.
- 2.8. The majority of original internal doors have been removed and replaced with C20 fire doors, many with large glazed panels.
- 2.9. The successful conversion from Class E to Class C3 will require careful consideration to ensure that the layout provides the ability for ergonomic residential layout suited to C21 living and to meet the requirements of the Building Regulations due to the change of use under the Building Act.
- 2.10. A large 2-storey extension to No. 20 Lemon Street has been constructed on what would have originally been the rear garden to No. 19 Lemon Street. A narrow path runs down the side of this building providing private rear access to No. 19 with a small yard area immediately outside the back door. Private parking for No.19 Lemon Street is provided behind the extension to No. 20

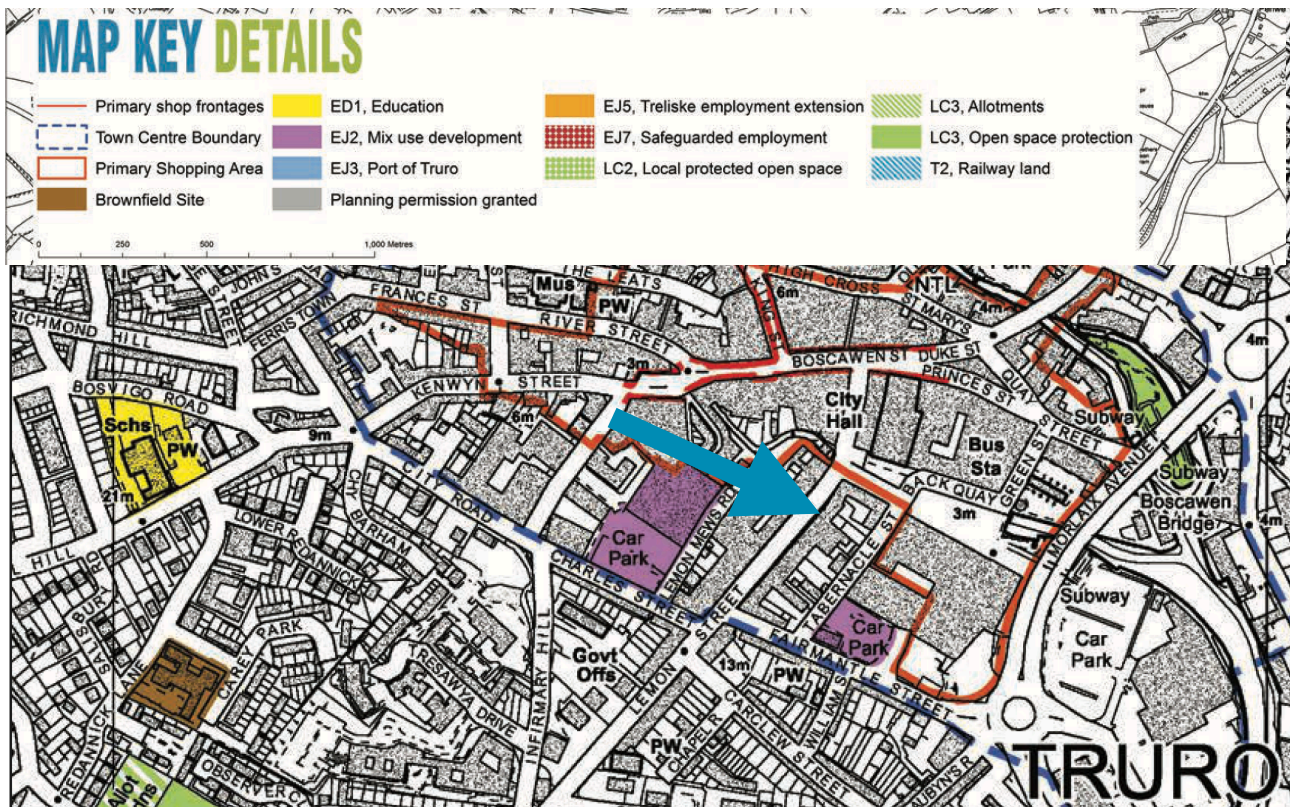
3. LOCATION

- 3.1. No. 19 Lemon Street is located near to the bottom of Lemon Street on the right-hand side, shown with the arrow below. The principal pedestrian access into the property is directly off Lemon Street.



Extract from Historic England map services

- 3.2. Vehicular access is provided to the rear of the property from Tabernacle Street where approximately 5 car parking spaces are currently provided within the site boundary.
- 3.3. The property lies within the 'town centre boundary', which runs along Charles Street and Fairmantle Street (as indicated on the Truro & Kenwyn Neighbourhood Plan 2015-2030 below), and approximately 0.1km from the Primary Shopping Area which begins at Lemon Quay. The subject property is indicated with the arrow.



Extract of 'Truro City Centre Map' from Truro & Kenwyn Neighbourhood Plan 2015-2030

- 3.4. All roads around the subject property are two-way although recent 'temporary' restrictions currently prevent access for private vehicles over Lower Lemon Street and onto Boscawen Street. These temporary restrictions have little or no impact on the subject property.
- 3.5. Properties on Lemon Street are a combination of commercial and residential use with Commercial use declining in favour of Residential use.
- 3.6. On-street parking immediately kerbside of 19 Lemon Street (both sides) provides short term parking (up to 1 hour) and there is a designated 'Residents Parking' are further up Lemon Street.
- 3.7. There is off road private parking to the rear of the property, accessed off Tabernacle Street.

4. PROPOSAL

- 4.1. The proposal is to convert No. 19 Lemon Street back to its original use as a Town House, as detailed on the Historic England listing, with a change of use from Class E to Class C.
- 4.2. The proposal does not include material alterations to the existing external facades of the original property. The change of use will be primarily facilitated by minor internal remodelling to provide the necessary accommodation including a self-contained 1 bedroom flat to the basement and residential townhouse accommodation within the main building comprising Kitchen / Dining Room and Lounge on the ground floor, 3no bedrooms, one ensuite and family shower room and WC on the first floor and 2no bedrooms both with ensuites and a further family shower room on the second floor.
- 4.3. Building Regulations will consider the work to be 'change of use' and therefore certain aspects of The Building Regulations will need to be applied and approved, unless a written statement from The Conservation Officer is provided confirming that the proposed work will "unacceptably alter the character of the building". The works anticipated are detailed below.
- 4.4. The 'change of use' application for Building Regulations will require alterations and upgrades to be made, with particular regard to Fire, Sound, Ventilation and Energy Efficiency. This will generally result in internal works to meet the requirements, including ventilation of the property generally, upgrading of thermal elements including walls, ceilings and floor, fire and sound-rated partitions / floor between separate occupancies (the basement flat) and the upgrading of windows to meet energy efficiency and security. In addition, alterations to above ground drainage will be required and it is proposed that these will be 'hidden' within floor voids and walls wherever possible.
- 4.5. We believe that the upgrading of external walls with external wall insulation (EWI) will be detrimental to the Historic Fabric as the frontage of the building is a significant for the historical integrity of the street.
- 4.6. Furthermore, we believe that the upgrading of traditionally constructed solid walls of this age (above ground level) with internal wall insulation (IWI) is likely to have a detrimental impact on the originally intended and designed permeability of the structure as a whole, not to mention the appearance of modern plaster finishes.
- 4.7. Therefore we request that the Conservation Officer provides written support that both internal and external insulation above ground level will be detrimental to the appearance and technical performance of the historical structure. **Should written support not be provided, external walls will need to be thermally upgraded**, which we would propose is undertaken with a ventilated lining membrane against the original wall to isolate any moisture, insulation and plasterboard finish internally.
- 4.8. External walls and floors **below ground level** (basement lounge & kitchen) will need to be provided with a lining membrane to prevent moisture ingress and this will also provide protection against other contaminants (Radon). We propose that a proprietary drained lining system, such as Delta or Newlath, is used throughout the basement for the control of moisture and contaminants. As existing

internal finishes will be covered, there is no justification in this case for not insulating the internal leaf of external walls.

- 4.9. External walls to the Second Floor will be upgraded with insulation to thermally upgrade the walls to current Building Regulation standards. The construction of the second floor is C20 and therefore not detrimental to the visual appearance or technical performance of the walls.
- 4.10. The existing provision for sanitary and kitchen facilities, and associated drainage and ventilation is, as expected, limited within office accommodation and therefore some substantial alterations and additional provision for supplies and drainage will be required. It is anticipated generally that the majority of services will be hidden within existing wall and floor voids internally. An additional Soil Vent Pipe (SVP) will be required to the rear elevation and will be hidden from public vantage points due to existing physical structures.
- 4.11. Existing windows throughout the property are generally timber single glazed. A Crittal window is installed to the basement rear and first floor WCs have timber casement windows. We propose that the sliding sash single glazed windows should be overhauled, repaired as required and redecorated.
- 4.12. It is proposed that the Crittal Window is replaced with a new timber sliding sash and casement windows replaced with more appropriate openings. All new windows are proposed to have slimlite glazing (4:6:4) to provide an improved thermal performance whilst maintaining the appearance.
- 4.13. Building Regulations will seek thermal upgrade of the single-glazed windows and with the Conservation Officer written support we propose that this will be undertaken with the (re-)introduction of timber shutters. If Conservation Officer support is not provided we will be required to upgrade of the windows in the form of double (slimlite) glazing or secondary glazing, which we believe will be detrimental to the visual appearance of the Listed Building.
- 4.14. Part Q of the Building Regulations also includes the security of vulnerable windows to be upgraded with regards to security and this could be achieved with a drop-down locking bar to the back of timber shutters, synonymous with historical shutters.
- 4.15. The internal layout will generally remain as existing with only minor changes, as detailed below:
- 4.15.1. Basement Bedroom - introduction of new partitions and door to enclose bedroom ensuite
 - 4.15.2. Basement rear entrance - introduction of new partitions to sub-divide the rear access for the basement flat and main dwelling house
 - 4.15.3. Ground floor - no alterations to layout proposed
 - 4.15.4. First Floor Bedroom 1 - introduction of new partitions and door to enclose bedroom ensuite
 - 4.15.5. Second Floor Bedroom 4 - new opening through C20 wall to proposed ensuite
 - 4.15.6. Second Floor Bedroom 5 - introduction of new partitions and door to enclose ensuite
 - 4.15.7. Second Floor Landing & Shower 2 - removal of C20 glazed partition and replace with new partition and door opening, new partition to subdivide ensuite and shower 2
- 4.16. The design proposed makes use of existing doorways, the existing doors will remain in place to enable the historic layout to be read. A new door opening is proposed on the second floor through a C20 partition which will not be detrimental to the historic fabric or finishes.

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- 4.17. New partitions within existing rooms as detailed above will be of timber stud work and plasterboard finish. Doors within new partitions will be of modern 6 panel raised and fielded design.
- 4.18. The new partition dividing the rear entrance to the basement flat and main house, will be required to be fire and sound resisting to meet current Building Regulations. This can be undertaken within the make-up of the new partition wall (insulation & fire-rated plasterboard).
- 4.19. The 2no. new rear access doors within the entrance lobby will need to be a 30 minute fire door which will be of solid 6-panel design.
- 4.20. As a three storey property, doors opening up onto the stairway will be required to be upgraded to be 30 minute fire resistance. Existing doors into offices are C20 fire doors, many with large glazed sections and not in-keeping with the Listed Building, particularly as many original architraves remain. It is proposed that existing doors are replaced with 4 or 6 panel doors, which are 30 minute fire rated where required.
- 4.21. A hierarchy of door design has been proposed within the Door Schedule, with 6 panel doors on the Ground and First floors,(which would have been the principal accommodation originally) and 4 panel doors within the Basement, Second Floor and ensuites / shower rooms.
- 4.22. An original 4-panel door remains to the ground floor - basement stairs and this will be retained and upgraded to meet Fire Regulations (if requested by Building Control) using specialist paint systems (such as Envirograf).
- 4.23. Existing door architraves will be retained in all locations.
- 4.24. Existing original skirting boards and Cornice details will be retained where provided.
- 4.25. The property appears to be currently provided with a three phase 315A electric supply, providing power, lighting and heating to the office. Evidence of a previous gas supply can be seen on the front elevation. The property is also provided with a mains water supply. Foul water drains are connected to the rear of the property.
- 4.26. The electric supply will be altered by National Power to provide separate 80 / 100A domestic supplies to the main house and self-contained flat. It is envisaged that the basement flat will be provided with electric heating and hot water.
- 4.27. Mains gas will be reconnected by Wales & West (provisionally using existing supply pipework subject to survey) for a new mains-gas heating and hot water installation for the main house. Pipework will be carefully hidden within wall and floor voids wherever possible.
- 4.28. There will be a requirement under The Building Regulations to provide compartmentation between the main house and basement flat, in the form of fire AND sound resistance. It is proposed to be undertaken primarily using approved applications from specialist suppliers, such as Envirograf, rather than replacing the fabric or fittings, subject to Conservation Officer and Building Control approvals.

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- 4.29. The new Part F of Building Regulations places a much more demanding ventilation requirement for new dwellings, including those created by change of use. Subsequently, with the provision of single glazed timber windows with no trickle vents, it is likely that Building Control will require a full Mechanical Ventilation and Heat Recovery System (MVHR) to be required. Such systems require ducts to be run around the building for intake (habitable areas) and extract (sanitary and kitchen areas) ventilation.
- 4.30. Alternatively, natural ventilation could be provided by passive ducts either through the roof or via air bricks through walls.
- 4.31. The Listed Building Consent Application includes a detailed Heritage Impact Assessment which provides a full assessment and mitigation with regards to proposed works and alterations.

5. PLANNING POLICY

- 5.1. The scheme has been developed with close reference to the National Planning Policy Framework (NPPF) 2019, the Cornwall Local Plan and the Truro & Kenwyn Neighbourhood Plan.
- 5.2. Changes introduced to the General Permitted Development Order in March 2021 permits properties under Class E (commercial, business and service) to be converted into dwellings without the need for Planning Permission providing that certain criteria have been met. In common with similar Permitted Development Orders, the new Class MA does not apply to listed buildings and therefore a Planning Application is required.
- 5.3. Notwithstanding this, the principal of converting business accommodation to dwellings exists by way of Governments intentions with the introduction of Class MA in order to provide a more streamlined approach for the provision of residential accommodation.
- 5.4. This, together with the Historic England description outlining the original use of the properties as a 's town house' should provide clear rationale for Cornwall Council to support this application.

5.5. National Planning Policy Framework (NPPF) 2019

- 5.5.1. Section 7 of the NPPF provides guidance on '*Ensuring the Vitality of Town Centres*' .
- 5.5.2. Paragraph 86 identifies that town centres play a crucial role of the local community and therefore Planning Policies should:
 - 5.5.3. a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, **allows a suitable mix of uses (including housing)** and reflects their distinctive characters;
 - 5.5.4. b) define the extent of town centres and primary shopping areas, and **make clear the range of uses permitted in such locations**, as part of a positive strategy for the future of each centre;
 - 5.5.5. c) retain and enhance existing markets and, **where appropriate, re-introduce or create new ones**;
 - 5.5.6. d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
 - 5.5.7. e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and

5.5.8. f) **recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.**

5.6. CORNWALL LOCAL PLAN 2010-2030

5.6.1. The key policies from the Cornwall Local Plan are as follows:

5.6.2. Theme 2: To enable self-sufficient and resilient communities.

5.6.3. Objective 5: Allow people and communities to provide for jobs and deliver homes locally to meet needs, where they can best support the role and function of local communities as well as allow for further change and adaptation

5.6.4. Policy 5: Business & Tourism

2. Proposals that would result in the loss of business space must:

- i. demonstrate there is no market demand through active and continued marketing for at least a period of 9 months; or
- ii. result in the provision of better quality employment space allowing for mixed use; or
- iii. be necessary to meet a clear need for community facilities; or
- iv. be unsuitable to continue as business use due to environmental considerations.

5.6.5. Policy 12: Design:

The Council is committed to achieving high quality safe, sustainable and inclusive design in all developments. Development must ensure Cornwall's enduring distinctiveness and maintain and enhance its distinctive natural and historic character. Development should demonstrate a design process that has clearly considered the existing context, and how the development contributes to the social, economic and environmental elements of sustainability through fundamental design principles.

1. As part of a comprehensive place-shaping approach, proposals will be judged against fundamental design principles of:

a. character – creating places with their own identity and promoting local distinctiveness while not preventing or discouraging appropriate innovation. Being of an appropriate scale, density, layout, height and mass with a clear understanding and response to its landscape, seascape and townscape setting; and

b. layout – provide continuity with the existing built form and respect and work with the natural and historic environment; high quality safe private and public spaces; and improve perceptions of safety by overlooking of public spaces

5.6.6. Policy 14: Renewable and low carbon energy:

To increase use and production of renewable and low carbon energy generation

5.6.7. Policy 21: Best use of land and existing buildings:

To ensure the best use of land, encouragement will be given to sustainably located proposals that:

- a. use previously developed land and buildings provided that they are not of high environmental or historic value.

5.6.8. Policy 24: Historic environment:

Development proposals will be permitted where they would sustain the cultural distinctiveness and significance of Cornwall's historic rural, urban and coastal environment by protecting, conserving and where appropriate enhancing the significance of designated and non-designated assets and their settings. Development proposals will be expected to:

- sustain designated heritage assets;
- take opportunities to better reveal their significance;

5.6.9. Policy 27: Transport and accessibility:

All developments should:

Provide safe and suitable access to the site for all people and not cause a significantly adverse impact on the local or strategic road network that cannot be managed or mitigated.

5.6.10. The Cornwall Local Plan encourages and confirms support of local Neighbourhood Development plans due to the diverse issues found across the County.

5.7. TRURO & KENWYN NEIGHBOURHOOD PLAN 2015-2030

5.7.1. The key policies from the Truro & Kenwyn Neighbourhood plan are:

5.7.2. EJ2. Truro City Centre – a vibrant and resilient high street:

“The city centre provides a vital community focus for Truro and Kenwyn offering a diverse range of activities in the form of residential, leisure, commercial and retail uses Increasing the residential capacity of the city centre can also bring significant benefits to its economic vitality and viability....”

5.7.3. Policy EJ2 Truro City Centre

The proposals map shows the town centre boundary, primary shopping area and primary shopping frontages of Truro. Development proposals in the city centre will be permitted where they contribute to the realisation of EJ1 and provide:

- A well-balanced mix of uses, including residential;
- High quality design and construction which integrates well with Truro’s distinctive and historic character including its setting, distinctive buildings, and green infrastructure as well as the quality of the public realm..... To support the continued vitality and viability of the city centre, development will be supported that reuses buildings or sites for residential use, including live/work accommodation and ‘living over the shop’.

5.7.4. What does the plan propose for housing?

To maintain a compact city and to increase residential presence in the city centre, the reuse of previously developed land must be a priority.

6. PLANNING APPRAISAL

6.1. This section provides an appraisal of the application proposals against the policies of the NPPF, Cornwall Local Plan and the Truro & Kenwyn Neighbourhood Plan. The assessment addresses the following planning policy considerations:

- Design
- Renewable & Low Carbon Energy
- Best use of land and existing buildings
- Historic Environment
- Transport & Accessibility

6.2. Design

6.2.1. The design of the proposal embraces the character and form of the existing building by minimising intervention to the external facades wherever possible. The existing facades already provide a domestic characteristic and proportion due to their original intended use as a Town House.

6.2.2. The Internal layout has been carefully considered to ensure that the removal of existing walls and partitions, door openings and other alterations to the fabric and historic layout are eliminated or minimised. Due to the need for compliance with Building Regulations, some intervention is inevitable and this shall be undertaken with care and attention to detailing. Partitions proposed to be removed are non-original.

6.2.3. Existing internal doors are not original and as office-style fire doors are not in-keeping with the building and therefore will be replaced with new 6 or 4 panel timber doors and painted. Doors will be certified as Fire Doors in locations required.

6.2.4. Existing timber sliding sash single glazed and are generally in a good state of repair and, subject to Building Regulations, be repaired and overhauled. Due to a 'change of use' for Building Regulations, thermal upgrading of windows will be required and therefore we are proposing to provide this with the installation of timber shutters rather than secondary glazing or slimlite double glazing.

6.2.5. Timber casement windows and C20 sliding sash windows to the second floor will be replaced with new timber windows as detailed on the Window Schedule with slimlite double glazed units (4:6:4). It is anticipated that Building Control will accept these as thermal upgrade to the existing.

6.2.6. Electrical, mechanical, plumbing, drainage / sanitary and ventilation installations will all require upgrading. Wherever possible, existing routes will be used for services and new routes carefully planned within floor and wall voids to restrict damage to historic fabric. Any service penetrations, including flues, vents and Soil Vent Pipes will all be routed to and exit on the rear elevation, generally out of site from public view.

6.3. Renewable & Low Carbon Energy

- 6.3.1. The change of use through Building Regulations will dictate that certain levels of thermal insulation (upgrades) are provided together with energy efficient forms of space and hot water heater, which in turn will drive down the energy consumption necessary for a comfortable living environment.
- 6.3.2. As a Listed Building located in a built-up area with limited grounds, the provision of renewables is likely to be restricted by the Conservation Officer and technically restricted due to roof profiles and site conditions generally.
- 6.3.3. The provision of new, efficient heating and hot water systems together with the installation of LED lighting throughout will provide a significant impact on the current carbon emissions.

6.4. Best use of land and existing buildings

- 6.4.1. It is acknowledged that the application site lies within the boundary of the Town Centre, however the NPPF, Cornwall Local Plan and Truro & Kenwyn Neighbourhood Plan all acknowledge the need, importance and benefit for housing within Town Centres.
- 6.4.2. Policy 5 (S2) of the Cornwall Local Plan outlines the criteria which should be demonstrated when Business Space is lost. The subject properties lie outside of the Primary Shopping Area, as identified on the Truro & Kenwyn Town Centre Map, and the proposed use is returning the property to its original intended use, therefore creating no adverse implications on the character of the area.
- 6.4.3. Although not applicable due to its Listed status, the recent addition of Class MA to the General Permitted Development Order (GDPO) serves as an indication of Governments intentions in providing an easier pathway to provide additional residential accommodation from premises with a Business Class Use. The criteria of GPDO undermines the need for 9 months continued marketing as laid out in Policy 5 of the Cornwall Local Plan, the GDPO requiring the property to be vacant for just 3 months.
- 6.4.4. There have been two recent conditional approvals granted by Cornwall Council (PA20/02532 & PA20/08276) where the loss of business space has been 'accepted' without demonstrating the criteria of Policy 5 (2). The latter application lies closer to the Primary Shopping Area and is also inside the Town Centre boundary and the former application cites distance from the nucleus of the main shopping area and outside the town centre boundary.
- 6.4.5. The external facades and proportions of the properties exude residential character together with surrounding properties and therefore the change of use back to the original intended use cannot be considered to be unreasonable.
- 6.4.6. The Cornwall Local Plan focuses on providing resilient communities to inject life back into Town Centres particularly outside of usual retail working hours.
- 6.4.7. The Truro & Kenwyn Neighbourhood Plan outlines the need for increasing the level of housing around the town centre to enable economic vitality and viability.

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- 6.4.8. The 'masterplan' for Pydar Street has recently been given approval at Planning Committee level and groundworks commenced on 01 February 2022. This carves the way for an entirely new vision for Truro, providing a mix of housing, retail and commercial uses throughout the development.
- 6.4.9. The Pydar Street development claims to be providing 231,000sq ft (21,460m²) of commercial space to include retail and business and this is likely to see even more movement away from premises which were not originally designed or intended for business use.
- 6.4.10. Local Commercial Agents have confirmed that there is no longer interest in older, large properties such as the subject property for a continued business / commercial use. The main reasons for this are the availability of more modern premises offering improved internal layouts, better communications, cheaper Business Rates and connectivity.
- 6.4.11. Over recent years there has been a steady move of non-town-centre dependant business, particularly office space, out of the town centre (or near town centre) to modern purpose-built accommodation providing high-speed broadband connections, configurable internal layouts, parking for staff and visitors, disabled and vertical access throughout, excellent access to transport networks and attractive reductions in business rates and rental.
- 6.4.12. The existing use of properties from the mid to upper sections of Lemon Street are already predominantly residential and therefore the increase in number of residential properties continue to improve the community feel and associated benefits to the local community.
- 6.4.13. Covid-19 has seen many changes in the way businesses operate and it is widely considered that business is unlikely to ever return to how it was pre. March 2020. This is even more likely with accommodation previously used as office space with the realisation that 'working from home' is not only possible, but can offer financial and socioeconomic advantages to employers and employees.

6.5. Historic Environment

- 6.5.1. A Listed Building Consent application has been made to Cornwall Council which includes an Historical Impact Assessment, which should be referred to in conjunction with this Design & Access Statement.

6.6. Transport and Accessibility

- 6.6.1. The proposal lies on the edge of the Town Centre and therefore accessibility by public transport is excellent. The main bus station, providing regular services to towns including Falmouth, Penzance, Camborne, Redruth, St Austell, Bodmin and Newquay, is located a 5 minute walk from the site.
- 6.6.2. The Railway Station is also within walking distance, approximately 10-15 minutes away with a regular bus service from the town centre if required. From here there are direct routes to Falmouth, Camborne, Penzance, Plymouth, Bristol, London and Edinburgh.
- 6.6.3. A residents parking zone is located on the upper section of Lemon Street approximately 25m from the front door of the subject property, however, there is private off-street parking provided to the rear of the subject property for up to 5 cars, accessed off Lemon Mews Road.

6.7. Cornwall Council Policy & Demand for Offices in Central Truro

6.8. Cornwall Council Planning policy over the last 30 years has led to significant numbers of out of centre shopping and modern office accommodation. The approval and support of many out of town centre office developments including:

- Newham
- Threemilestone
- Penstraze
- Trevissome
- Tolvaddon

6.9. These modern offices have the following major advantages:

- Significantly cheaper rents and business rates
- Modern facilities including high speed internet
- Variety of large open plan and smaller spaces
- DDA compliant including access, lifts, WC's & facilities
- Parking for clients
- Access to principal transport routes

6.10. The COVID pandemic has also resulted in a massive increase in working from home. The full return of employees to offices has not returned to pre-pandemic levels and it is likely the demand for office space will never return to these levels.

6.11. The combined effects of Cornwall planning policy and massively and prolonged working from home as a result of COVID has significantly reduced the demand for both retail and office accommodation in Truro City centre. It is noted there are currently many vacant commercial properties within Truro City Centre.

6.12. The outdated facilities, poor access and cheaper, modern offices at out of centre locations around Truro and further a field, with quicker transport routes to the A30, on site parking and up to 50% cheaper rents and business rates, are unsurprisingly much more attractive to businesses.

6.13. The introduction of the new Class MA as Permitted Development provides a pathway for creating residential properties from business premises without a formal Planning Application, although it does not apply to Listed Buildings in order to protect the character and appearance of Listed Buildings. Notwithstanding the above, National Government intentions to support this change of use are clear.

6.14. Consideration has been given to Planning Policy including the NPFF 2019, Cornwall Local Plan and the Truro & Kenwyn Neighbourhood Plan in developing the proposal. Policy 5 of the Cornwall Local Plan Adopted November 2016 states that:

a "Proposals that would result in the loss of business space must: i) demonstrate there is no market demand through active and continued marketing for at least a period of 9 months..... iv) be unsuitable to continue as business use due to environmental considerations"

6.15. The current occupants of 65 Lemon Street have been predominantly working from home since the pandemic, realising that remote working is not only possible but for many staff desirable and therefore the need of large office accommodation is no longer required.

6.16. Cornwall Council has approved conversions of traditional buildings from business use to residential: former hairdressers at 28 Lemon Street, Ref: PA20/08276 which is within Primary Shopping Area and Town Centre boundary, and former offices at 5 Upper Lemon Villas, Ref: PA20/07469 have been approved without the application of Policy 5 and therefore precedent has been set by Cornwall Council on previously determined applications with the planning officers comments as follows:

*PA20/02532 - Proposed conversion and reinstatement of existing building into a single dwelling
5 Upper Lemon Villas, Lander House Lemon Street Truro TR1 2PD*

Principle:

Policy 5 of the Cornwall Local Plan requires proposals that would result in the loss of business space to, amongst other things, demonstrate there is no market demand through active and continued marketing for at least a period of 9 months. Whilst this information has not been submitted, this unit is situated outside the defined limits of Truro City Centre and outside the nucleus of the central shopping area.

Although this would usually not be satisfactory to satisfy the requirements of policy 5, the planning history of the site weighs in its favour given its original use. The proposal is returning the building to its former use and it is not considered unreasonable given its residential character, with surrounding buildings being primarily in residential use.

Conclusion:

Taking these factors into account, on balance it is considered that the proposal is acceptable, subject to conditions. All other matters raised have been taken into account, including the planning history and the comments of the City Council, but none is of such significance as to outweigh the considerations that have led to the conclusion.

6.17. Therefore we believe the requirement to market for 9 months is not required because the buildings are outside of the Primary Shopping Area. Notwithstanding this Cornwall Council has approved the conversion of business use to residential within and outside the Primary Shopping Area and Town Centre Boundary without the 9 month marketing requirement on other applications and thereby setting a clear precedent.

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- 6.18. Furthermore, National Guidance requires buildings to be vacant for 3 months. A solicitors company occupied the building from before 1989 until June 2004. Goundry ad Pearce occupied the building from June 2004 - June 2022 and therefore the building has been vacant for more than 3 months.
- 6.19. Additional Policy compliance could be forwarded that the building “*be unsuitable to continue as business use due to environmental considerations,*” for example the works required to upgrade the existing facilities for access, toilets and kitchenettes would provide more harm to the historic asset and would not be supported by the Conservation Officer when there is an obvious suitable use that minimises disruption and loss of historic fabric.
- 6.20. As a Listed Building, careful consideration has been given to the proposed design and internal layout in order to minimise disruption or loss to the fabric, whilst enabling an ergonomic layout suited to 21st Century living. Therefore we believe the principle of the proposal to revert the buildings to their original residential use, with the rear additional self-contained flats, is acceptable.
- 6.21. The Heritage Impact Assessment follows the design concept as it has evolved and avoided harming the aesthetic and evidential value of the building and the proposed solutions to the internal arrangements are acceptable.
- 6.22. The proposal will instil a viable, original use to the building and will enhance the heritage assets and their setting.”

7. SUSTAINABILITY

- 7.1. Lemon Street is within easy walking distance of Truro City Centre which provides transport links to key towns to the West and East of Cornwall and local villages. Truro has a wide range of shops and services with opportunities for employment. There are health facilities including Doctors Surgeries, Opticians and Dentists all within walking distance of the application site. The hospital is approximately 15 minutes away and accessible by regular bus service.
- 7.2. The principal Bus Station is located at Lemon Quay (approx. 5 mins) from which regular bus routes are provided to key towns, including Penzance, Falmouth, St Austell and Bodmin. Local services to outlying villages within a 6 mile radius and Truro Circuit routes are also available. In addition, the National Express service also stops at Truro providing a regular service from Penzance to London.
- 7.3. The railway station is also within walking distance (approx. 15 mins) where regular mainline services are provided from Penzance to London Paddington and with connections to locations including Bristol, Cardiff, and The North. In addition there is a regular branch line service to Falmouth.

8. GREEN INFRASTRUCTURE PLAN

- 8.1. The front elevation accesses directly onto Lemon Street with a narrow defensible margin providing access to the Basement, enclosed by metal railings and granite sets.
- 8.2. A small, level amenity space is provided to the front of the basement, partially covered by the granite access over to the main house front door. Waste and Recycling for the basement flat can be provided within this area.
- 8.3. The rear access off Tabernacle Street provides a tarmac parking area and a narrow path leading to the rear of the subject building. No. 20 Lemon Street has a large rear extension which has been built in what would have been the rear garden of No. 19 Lemon Street.
- 8.4. A small concrete yard is provided and forms a margin between the rear of 19 Lemon Street and 20 Lemon Street, the area can be used for Waste and Recycling for the main house. A lean-to store is provided within the rear yard and can be used for storage of bicycles and other outdoor amenity equipment.
- 8.5. Planting can be provided within the yard areas (rear and basement) in the form of planters with suitable drought-resistant, pollinator-friendly specimens, food growing or kitchen herbs to provide an element of 'green infrastructure', but the external area available is limited.
- 8.6. External lighting to the rear elevation will be limited to movement-sensitive activated lighting.

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- 8.7. Biodiversity will be enhanced with the introduction of rodent-proof bird feeders, predominantly to the rear of the site, although this must be undertaken with caution due to the volume of Gulls which nest on roofs all around the application site.
 - 8.8. The existing tarmac parking area is to be retained due to the lack of private parking within the area. Furthermore, Part S of the Building Regulations require new dwellings to be provided with Car Charging Points and this is the only location such can be installed.

9. CONCLUSION

- 9.1. The NPPF 2019, Cornwall Local Plan and Truro & Kenwyn Neighbourhood Plan generally supports the proposal with regards to Design, Best Use of land and existing buildings, historic environment and Transport & Accessibility.
- 9.2. Use of buildings within the city centre are beginning to show signs of a change which is supported by Planning Policy in revitalising City Centres, this has been reflected by the recent marketing of the subject property.
- 9.3. Planning Policy supports the nature and spirit of the proposal being submitted including Design, Best Use of Land and Existing Buildings and Transport & Accessibility.
- 9.4. We advise Cornwall Council Policy supports the conversion for 3 reasons:
- Firstly there is a shortage of residential space in Truro and Cornwall.
 - Secondly the building was constructed as a residential building and should be used as such.
 - Thirdly the use of the building as a residential property will return the use of the building to the original intended use and has no adverse implications on the character of the area.
- 9.5. In addition, Truro needs to have a more residential focus in the town centre for environmental reasons, people can walk to the stores and it helps revitalise Truro's raison d'être.
- 9.6. Therefore we believe the application should be approved.
- 9.7. To this end, we commend this Statement to you as supporting evidence to obtain approval for this development proposal.

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Chartered Building Surveyor
FOR SMT ASSOCIATES
13 October 2023