

November 2020

The Planning Department
Boston Borough Council
Municipal Buildings
West Street
Boston

Our ref: PROG105

By email only

Dear Sir/Madam,

**PROPOSED CHANGE TEMPORARY CHANGE OF USE FROM RESIDENTIAL
ACCOMMODATION TO OFFICE USE
Tattersall House, Boston**

I am pleased to submit a full planning application on behalf of our client, Progress Housing Association Ltd, at 4 Tattersall House in Boston. Consent is sought for a temporary change of use (utilising part of the ground floor of the building) from a number of cluster flats to office use for the NHS Trust.

The application has been submitted via the Planning Portal (PP-09268673) and comprises the relevant application forms; location plan; existing and proposed internal layout drawings and this supporting statement.

Introduction

The application site is located to the northern edge of the Boston settlement and comprises a number of cluster flats within a larger building, owned and managed by the applicant, Progress Housing Association.

The accommodation is used for key workers and those associated with the emergency services, in conjunction with facilities at Pilgrim Hospital. Planning permissions B/05/0098 and B/05/0401 are relevant and contain conditions relating to occupancy of the flats.

Proposals

This application seeks a change of use for part of the ground floor, currently occupied by 15 flats and communal facilities, to temporary office space for departments within the NHS Trust. A period of 18 months is sought for the change and is required due to current, pressing issues in the availability of suitable office space for employees, including those within the Occupational Therapy Team. This need is exacerbated by current implications imposed by COVID 19 and ensuring that key, frontline staff are able to work in appropriate conditions.

The nature of the residential accommodation is such that it is occupied for short periods by staff required to live on/near the hospital. The Trust currently have suitable levels of residential capacity and therefore the temporary change of 15 flats raises no issue in this regard.

No external alterations are required to facilitate the proposals.

Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 relates to the development plan as a whole and requires applications to be determined in accordance with the plan, unless material considerations indicate otherwise. In this case, the development plan comprises the South East Lincolnshire Local Plan 2011-2036, adopted in March 2019.

The site is located within the settlement boundary and is of no specific designation in the Plan. The application property is denoted by a red star for clarity.

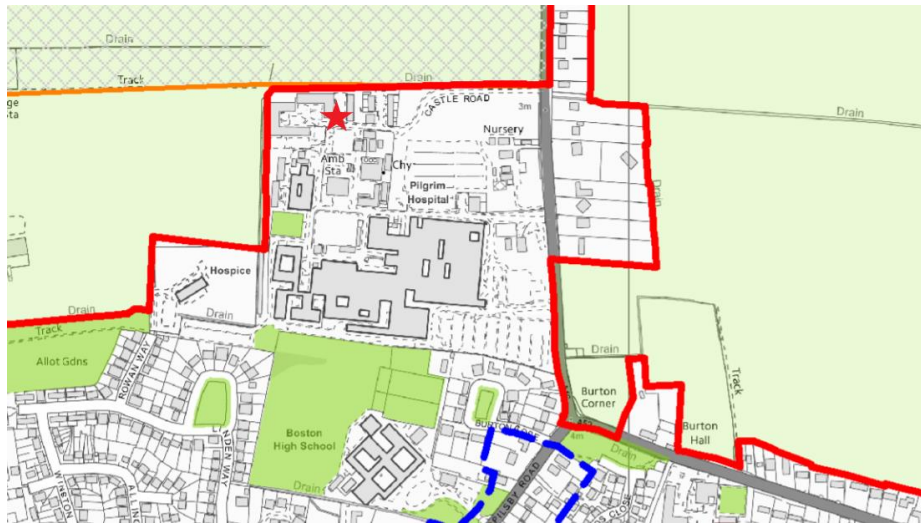


Figure 1 – Local Plan excerpt

The following policies are relevant to the determination of this application:

- Policy 1 - Spatial Strategy
- Policy 2 – Development Management
- Policy 4 – Approach to Flood Risk
- Policy 7 – SE Lincolnshire's Employment Portfolio
- Policy 30 - Pollution

There are no overarching policy provisions which would prohibit the proposed change of use. Policy 7 seeks to ensure that the Borough maintains and delivers employment floorspace in suitable locations.

Beyond any defined employment designation (such as the application site) the policy advises that new development will be supported subject to assessment against a number of criteria. It is considered that the proposed temporary change of use, which will allow the NHS Trust to work at optimal capacity during this difficult period in the healthcare profession, does not conflict with the aim of Policy 7.

The site is part of the wider Pilgrim Hospital complex, which contains a number of associated and ancillary uses. The provision of a modest amount of office space within this existing building is therefore compatible with the surrounding land uses and is only required as an interim measure whilst issues around existing accommodation is addressed.

Flood Risk Assessment

The application site lies within Flood Zone 3, as identified by the Environment Agency mapping system.

National Planning Practice Guidance defines Flood Zone 3 as land with a high probability of river or sea flooding.

The current use of the site is defined as being within the 'more vulnerable' category of properties and uses at risk to flooding. The proposed office use is within the 'less vulnerable' category as confirmed in the PPG.

Planning Practice Guidance confirms that the scope of a site-specific Flood Risk Assessment is to establish:

- Whether a proposed development is likely to be affected by current or future flooding;
- Whether it will increase flooding elsewhere; and
- Whether the measures proposed to deal with these effects and risks are appropriate

The Practice Guidance also confirms that any such assessment such be proportionate to the risk, scale, nature and location of the development.

As this application proposes a change of use with no external alterations; no extensions; no changes to current floor levels and no changes to current water discharge arrangements, the risk associated with the proposals are no greater than as existing. Therefore, the development is 'appropriate' in accordance with the compatibility table below.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓*

Key:

✓ Development is appropriate

✗ Development should not be permitted.

Figure 3 – Flood Risk vulnerability and compatibility (NPPG)

With regard to changes of use, NPPG paragraph 048 (ID: 7-048-20140306) confirms that the vulnerability of the respective uses should be considered. It is also highlighted that the respective LPA may have a specific Local Plan policy with regard to what changes of use will be acceptable in areas at risk of flooding.

Policy 4 of the SE Lincolnshire Local Plan states:

“Change of use of existing buildings will be supported providing they do not pose an increase in risk to people”.

The temporary change of use from residential accommodation to office use is therefore compliant with the adopted Policy.

Air Quality

The proposed development falls within the 'minor' category as defined in the Air Quality and Emissions Mitigation guidance prepared by the East Midlands Air Quality Network. Accordingly, a detailed AQA is not necessary.

The proposed office use is for an 18 month period only and is not significantly more intense than the existing. Therefore, exposure is not deemed to be an unacceptable concern and mitigation is not proposed as part of the scheme. The development is therefore compliant with Policy 30 of the Local Plan.

Conclusion

This statement has been prepared in support of a proposed change of use at Tattersall House in Boston. The application seeks temporary consent for partial use of the ground floor as office space.

The development will assist in providing urgently needed capacity for NHS staff, in a sustainable location at the Pilgrim Hospital site.

The proposals raise no conflict with the aforementioned policies of the South East Lincolnshire Local Plan. Accordingly, planning permission should be granted in accordance with paragraph 11c of the National Planning Policy Framework.

I trust you have all information necessary to validate the application. However, if you have any queries at this stage or wish to discuss the scheme during the determination process, please do not hesitate to contact me. Accounting for the urgency associated with the proposed use, your earliest attention would be greatly appreciated.

Yours sincerely

Lee Greenwood

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