



**Planning Statement**

15 London Road, East Grinstead

February 2026





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## 1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by hgh Consulting on behalf of our client Harradine & Co Limited ('the applicant') in support of the proposed development at 15 London Road, East Grinstead, RH19 1AJ.
- 1.2 The Planning Statement is submitted to Mid Sussex District Council ('MSDC') as part of an application for full planning permission for:

*“Change of use of the upper floors of the existing building from commercial (Class E) to HMO (Sui Generis) use, front and rear extensions, and associated external alterations and ancillary works.”*

- 1.3 This Planning Statement assesses the proposed scheme against the adopted development plan and other material planning considerations. It should be read in conjunction with the other supporting information submitted, which comprises:

- Planning application form and certificates;
- Planning Obligation Instruction Form;
- Planning Statement (this document), including Biodiversity Statement;
- Design and Access Statement, including Sustainability Statement; and
- The following drawings, prepared by Ascot Design:
  - 25-J4875-01-LP - Location Plan;
  - 25-J4875-04-001 - Existing Elevations;
  - 25-J4875-04-002 - Existing Floor Plans;
  - 25-J4875-02-001 - Proposed Floor Plans; and
  - 25-J4875-03-001 - Proposed Elevations.

- 1.4 The remainder of this Planning Statement is set out as follows:

- Section 2 describes the development site and its surroundings;
- Section 3 sets out the planning history;
- Section 4 describes the proposed development;
- Section 5 sets out the relevant planning policy framework and guidance;
- Section 6 assesses the proposed development against the relevant planning policies having regard to other material considerations; and
- Section 7 sets out the summary and conclusions.

## 2.0 SITE AND SURROUNDINGS

2.1 The site is located in East Grinstead Town Centre. It is a part one, part two, part three storey building. The rear of the building is in residential use and is excluded from the scope of the application. Until recently the remainder of the building (ground, first and second floors) was occupied by Natwest as a commercial bank, with the upper floors acting as ancillary commercial floorspace. The ground floor is currently being refurbished for occupation by a hairdressing salon, for which no change of use is required. The application therefore relates to the upper floors of the building only, which are accessed via the rear of the property.

Figure 1: Existing Site (source: Google Street View)



2.2 The site’s surroundings are a mix of commercial and residential uses. The site is subject to the following designations in the adopted Local Plan:

- Primary shopping frontage;
- Outside but adjacent to the East Grinstead Conservation Area; and
- Ashdown Forest 7km Zone of Influence.

2.3 The existing building on the site, which was understood to be constructed in the 1930s, is not statutorily or locally listed, and it is not in immediate proximity to any other listed buildings. However it is adjacent to the East Grinstead Conservation Area, which lies immediately to the south of the site.

2.4 The site is in a highly sustainable location; in easy walking distance of all the facilities and services of the town centre including supermarkets, shops and restaurants. East Grinstead train station is an 11-minute walk from the site and provides regular services to London Victoria (Southern Rail and Thameslink).

Figure 2: Existing Site (source: Google Maps)



2.5 The site is in Flood Zone 1 with a low risk of flooding.

### 3.0 PLANNING HISTORY

- 3.1 The planning history for the site is largely in relation to its former use as a bank and not relevant to the current proposals.
- 3.2 Of note, in 2010 planning permission was granted for the conversion of disused retail space to the rear of the building into residential use (application ref. 10/02304/FUL). Officers found that the proposed conversion would make good use of unused space behind and above the existing commercial unit and that the development would not adversely affect neighbouring residential amenity or the character of the area. This permission has been implemented, and the rear of the building is in residential use; this part of the building is outside of the scope of this application and will be unaffected by the current proposals.

## 4.0 THE PROPOSED DEVELOPMENT

4.1 The proposed development comprises:

- Change of use of first and second storey floorspace from ancillary commercial (Class E) use to 8 x HMO bedrooms (Sui Generis), with associated communal facilities;
- Double storey front extension facing London Road;
- Single storey rear infill extension; and
- Ancillary works including a proposed rooflight, extension of existing wall and flat roof to the rear.

4.2 The proposed extensions have been designed to match the existing building, including the windows and a tilehung finish to match the existing front elevation. The image below is a visualisation of the proposed front elevation.

*Figure 3: Proposed front elevation*



4.3 Full details of the proposal are set out in the Design and Access Statement and drawing pack prepared by Ascot Design.

## 5.0 PLANNING POLICY CONTEXT

5.1 The development plan for the site comprises:

- Mid Sussex District Plan 2014-2031 (2018);
- Site Allocations Development Plan Document (2022); and
- East Grinstead Neighbourhood Plan (2016).

5.2 Mid-Sussex has prepared a new draft Local Plan which, when adopted, will supersede the District Plan and Site Allocations DPD. The emerging Local Plan has been submitted for Examination in Public by the Secretary of State; the Examination is anticipated to begin in February 2026. At this time the policies in the emerging plan can be given only limited weight in decision-making; as it progresses through the Examination, the weight given will increase.

5.3 Relevant policies in the adopted and emerging Local Plans are set out below.

### *Mid Sussex District Plan 2014-2031*

- **Policy DP2 - Town Centre Development:** states that within the primary shopping frontages, changes of use will be permitted where a clear predominance of Class A1 shop uses would be maintained, the nature of the proposed use would sustain and enhance the vitality and viability of the centre, and the location and prominence of the proposed use would not lead to a significant break in the continuity of the shopping facilities. Changes of use to offices or residential use at ground floor level will be resisted.
- **Policy DP4 - Housing:** seeks to deliver 16,390 new homes between 2014 and 2031 (an average of 876 dwellings per annum).
- **Policy DP17 - Ashdown Forest SPA and SAC:** states that within the 7km zone of influence, residential development leading to a net increase in dwellings will be required to contribute to mitigation through financial contributions to SANG and the SAMM strategy.
- **Policy DP21 - Transport:** states that decisions on development proposals will take account of whether the scheme is sustainably located to minimise the need for travel.
- **Policy DP26 - Character and Design:** seeks to ensure that all development is well designed and reflects the distinctive character of its surroundings.
- **Policy DP30 - Housing Mix:** states that housing development should provide a mix of dwelling types and sizes that reflects current and future local housing needs.
- **Policy DP39 - Sustainable Design and Construction:** states that all development proposals must seek to improve the sustainability of development and should where appropriate and feasible according to the type and size of development and location, incorporate measures including renewable sources of energy.

### *East Grinstead Neighbourhood Plan*

- **Policy EG3 - Promoting Good Design:** states that planning permission will normally be granted where criteria relating to good design are met, including that the form of the proposed development is proportionate and in keeping with the scale, height, materials and site coverage of the surrounding area.
- **Policy EG5 - Housing:** states that new housing will be supported on land defined as previously developed.

### *Emerging Local Plan (Submission Version 2025)*

- **Policy DPS2 - Sustainable Design and Construction:** requires all development to submit a proportionate sustainability statement to demonstrate how it will contribute to the reduction of greenhouse gas emissions.
- **Policy DPS6 - Health and Wellbeing:** requires all new development to be designed to achieve healthy, inclusive and safe places by embedding the principles of the 20 minute neighbourhood and 'local living' including being of high quality within its design and construction.
- **Policy DPC6 - Ashdown Forest SPA and SAC:** requires residential development leading to a net increase in units within a 7km zone of influence around the Ashdown Forest SPA, to contribute to mitigation through SANG and SAMM contributions.
- **Policy DPB1 - Character and Design:** requires all new development to be designed in accordance with the Mid Sussex Design Guide Supplementary Planning Document (SPD). All new development must be of high quality and respond to its context, be inclusive and prioritise sustainability. It must create a sense of place while addressing the character and scale of the surrounding buildings.
- **Policy DPB3 - Conservation Areas:** states that development must protect the setting of the conservation area and in particular views into and out of the area.
- **Policy DPT4 - Parking and EV Charging Infrastructure:** requires development to take account of the guidance in the Mid Sussex Design Guide SPD and the WSCC Guidance on Parking at New Developments.
- **Policy DPE6 - Development within Primary Shopping Areas:** states that in primary shopping areas, residential uses will be supported at upper storeys, but resisted at ground floor level.
- **Policy DPH11 - Dwelling Space Standards -** requires new residential development to meet the minimum nationally described space standards.

5.4 The National Planning Policy Framework and Mid-Sussex Design Guide SPD (2020) are also material considerations in the determination of a planning application.

## 6.0 PLANNING ASSESSMENT

6.1 This section assesses the proposed development against the relevant development plan policies and other material considerations. The key matters for assessment are:

- (a) Principle of loss of commercial (Class E) floorspace;
- (b) Principle of HMO (Sui Generis) accommodation;
- (c) Quality of proposed accommodation;
- (d) Design;
- (e) Heritage;
- (f) Flood risk and drainage;
- (g) Car parking; and
- (h) Biodiversity Net Gain.

6.2 Paragraph 11(d) of the NPPF requires local authorities to apply a presumption in favour of sustainable development where there are no relevant development plan policies, or where the policies which are most important for determining the application are out of date. Paragraph 11(d) requires particular regard to be given to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually, or in combination.

6.3 Footnote 8 clarifies that this includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites, or where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.

6.4 An appeal decision dated 2<sup>nd</sup> May 2025 (ref. APP/D3830/W/24/3350075) confirms that Mid-Sussex District Council does not have a five-year housing land supply, with the figure between 2.41 years and 3.38 years. Therefore the 'tilted balance' is engaged, meaning that there is a presumption in favour of sustainable development.

### **Principle of Loss of Ancillary Commercial (Class E) Floorspace**

6.5 The site is located within East Grinstead Town Centre and forms part of the primary shopping frontage. Policy DP2 of the Mid Sussex District Plan relates to development within the town centre. The policy states that within the primary shopping frontages, changes of use will be permitted where a clear predominance of shop uses would be maintained, the nature of the proposed use would sustain and enhance the vitality and viability of the centre, and the location and prominence of the proposed use would not lead to a significant break in the continuity of the shopping facilities. Changes of use to offices or residential use at ground floor will be resisted.

6.6 The emerging Local Plan Policy DPE6 states that in primary shopping areas, residential uses will be supported at upper storeys.

- 6.7 The site was previously in use as a NatWest bank (Class E use). The ground floor was accessible to the public for banking services, and the upper floors were in an ancillary office use. The bank closed in August 2024 and the building has been vacant for approximately 18 months. A lease has now been granted to a hairdressing salon to operate from the ground floor only. The salon does not require the use of the upper floors of the property, to which this application relates.
- 6.8 The proposed development would therefore result in the loss of ancillary commercial space (that is surplus to requirements) only. The ground floor unit remains a viable commercial unit in Class E use; as such, the clear predominance and continuity of shop uses on London Road would be maintained. Furthermore, the proposed HMO use will further support the viability and vitality of the town centre, by introducing new residents into a highly sustainable location who will further support the shops and services of the town centre. Finally, the HMO accommodation will be accessed from the rear, with no impact on the layout or viability of the ground floor commercial unit.
- 6.9 As such, it is considered that the proposed conversion of the first and second floors of the building from ancillary commercial to HMO use would comply with the requirements of Policy DP2 and is supported by emerging Policy DPE6.

#### Principle of HMO (Sui Generis) Accommodation

- 6.10 Policy DP4 of the adopted Local Plan seeks to deliver an average of 876 new homes per year between 2014 and 2031. Policy DP30 Policy EG5 of the East Grinstead Neighbourhood Plan states that new housing will be supported on land defined as previously developed.
- 6.11 The Local Plan (adopted and emerging) does not contain policies specifically in relation to HMOs, but it has previously been accepted that HMOs contribute to the housing needs of the District. For example, in 2020, planning permission was granted for the change of use of Harwood Farmhouse, East Grinstead, from a house to an HMO for 8 people (reference DM/20/1612). The Officer's Report stated that:

*“Whilst an HMO is not regarded as a dwelling, the proposal would still comply with Policy DP30 of the District Plan which relates to Housing Mix and seeks to provide a mix of dwelling types and sizes. The principle of such a use is considered acceptable. It would also not contravene the aims of policy DP4, DP5 and DP6 of the District Plan and EG5 of the Neighbourhood Plan as it does not reduce or remove a dwellinghouse from the housing stock or supply and is located within the built up area of East Grinstead where such uses are considered acceptable.”*

- 6.12 It is considered that the same principle applies to this application. The proposed HMO accommodation will assist with providing a choice of housing in a highly sustainable location, within the town centre. It is on previously developed land and is therefore considered to comply with Policy EG5 of the Neighbourhood Plan. While an HMO does not fall into the C3 residential use class, it would contribute towards the overall housing need of the District and reduce pressure on housing elsewhere.

### Quality of Proposed Accommodation

- 6.13 The proposed accommodation comprises 8 x HMO bedrooms, of which 7 are double bedrooms and 1 is a single bedroom. There are two kitchens (12sqm and 9.4sqm respectively), three bath/shower rooms and a separate WC, and a communal living and dining area proposed (31sqm). The facilities proposed will meet the guidance set out in the Mid Sussex District Council Standards for Houses in Multiple Occupation (some of which is outside of the scope of the planning system).
- 6.14 Each HMO bedroom is of a generous size of up to 20.9sqm. All are well above the minimum standards<sup>1</sup> of 6.51sqm for a single bedroom and 10.22sqm for a double bedroom, as shown in the table below.

Table 1: Proposed Bedroom Sizes

Bedroom Name	Occupancy	Minimum Standard	Proposed Size
Bedroom 1	Double	10.22sqm	19.5sqm
Bedroom 2	Double	10.22sqm	18.2sqm
Bedroom 3	Single	6.51sqm	12.2sqm
Bedroom 4	Double	10.22sqm	13.7sqm
Bedroom 5	Double	10.22sqm	17.4sqm
Bedroom 6	Double	10.22sqm	20.9sqm
Bedroom 7	Double	10.22sqm	19.4sqm
Bedroom 8	Double	10.22sqm	16.7sqm

- 6.15 All bedrooms are equipped with windows which will provide natural light and ventilation. A rooflight is proposed to the living and dining room to provide natural light and ventilation to this room.

### Design and Heritage

- 6.16 The Design and Access Statement sets out details of the design strategy which has sought to reinforce the established architectural form of the building and maintain the rhythm of the London Road frontage.
- 6.17 The existing elevations show a gabled composition with traditional detailing. The proposed front elevation continues the gabled form, replicates the tile-hung finish and matches existing window proportions. The extension does not exceed the established ridge height and is visually integrated into the overall façade.
- 6.18 The single-storey side infill extension is deliberately subservient in scale and largely screened from public vantage points. The sectional drawing confirms that it sits comfortably beneath the principal roofline.

<sup>1</sup> As per The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018 and the Mid Sussex District Council Standards for Houses in Multiple Occupation 2015

- 6.19 The building, which is understood to date to the 1930s, is not statutorily or locally listed. It is not in close proximity to any listed buildings. However, it is adjacent to the East Grinstead Conservation Area.
- 6.20 The East Grinstead Conservation Area Appraisal (2019) sets out the key elements of the character of the Conservation Area to be preserved or enhanced. It states that:

*“The appearance and character of the conservation area also owes much to the traditional shopfronts, the rich variety of architectural forms, styles and visibility and attractiveness of the materials represented in its buildings. These reflect the influence of successive historical periods, as buildings have been adapted to meet changing economic circumstances and includes timber framing, brick, sandstone, tile hanging, timber cladding and Horsham stone and tiled roofs. These materials and details add authenticity to the Conservation Area.”*

- 6.21 The application site, which is located within the setting of the Conservation Area, relates well to these attributes. It exhibits a traditional gable composition, tile hanging, and brickwork. The proposed extensions, particularly the front extension which will be visible from London Road, will be designed to match the existing building and incorporate these traditional materials. The extension will mirror the existing gabled form of the building, adding a natural symmetry to the property. The proposed development would therefore preserve and enhance the character and appearance of the Conservation Area, protecting the setting of the Conservation Area and having no material impact on views in and out.

#### **Flood Risk and Drainage**

- 6.22 The application site is located within Flood Zone 1 and is not at risk of surface water flooding. The works proposed are at first and second floor level and largely internal, other than the proposed extensions. Existing drainage arrangements will continue to be used and no new connections to the drainage network are proposed. Therefore, it is not considered that the proposed development will give rise to any flood risk or drainage implications.

#### **Car Parking**

- 6.23 The proposed development is car-free. The site is in a highly sustainable location in East Grinstead Town Centre. It is within easy walking distance of services and facilities including:
- Iceland Supermarket (3 minutes)
  - Pure Gym (3 minutes)
  - Waitrose Supermarket (4 minutes)
  - East Grinstead Library (4 minutes)
  - East Grinstead Post Office (4 minutes)
  - Ship Street Doctors Surgery (5 minutes)
  - Sainsburys Supermarket (11 minutes)

- East Grinstead Railway Station (12 minutes)

6.24 In addition, there are bus stops within a 1-minute walk of the site which provide regular services towards Caterham, Crawley, Selsdon, Lingfield and Tunbridge Wells among other destinations. It is therefore clear that all necessary facilities and services, as well as many employment opportunities, are easily accessible by walking or public transport. As such, it is not considered that it would be appropriate or necessary to provide car parking spaces in this location.

#### **Biodiversity Net Gain**

6.25 The application is subject to the *de minimis* exemption and is therefore not subject to the requirement to demonstrate Biodiversity Net Gain. The proposed development is a change of use at upper floors alongside front and rear extensions. There is no existing habitat on the site, which consists entirely of built development or existing sealed hardstanding. The site is classified as developed land: sealed surface which has a biodiversity value of zero under the statutory biodiversity metric. Therefore:

- The development will not impact any onsite priority habitat; and
- The development will not impact more than 25sqm of onsite habitat or more than 5m of linear habitat.

6.26 There is therefore no impact on biodiversity, and the *de minimis* exemption applies.

## 7.0 SUMMARY AND CONCLUSIONS

- 7.1 The proposed development comprises the conversion of ancillary commercial floorspace to 8 HMO bedrooms, with associated communal space. The modest proposed extensions at the front and rear of the property are of high-quality design; they will complement the existing building, match existing materials, and positively relate to the adjacent Conservation Area.
- 7.2 This Planning Statement has demonstrated that the proposed development is compliant with the relevant planning policies set out in the adopted and emerging Local Plans, and the East Grinstead Neighbourhood Plan. It will deliver a number of benefits including a contribution towards the housing needs of the District, the provision of accommodation in a highly sustainable town centre location, and the economic benefits of additional residents supporting the services and facilities of the town centre.
- 7.3 As the Council cannot demonstrate a five-year housing land supply, the presumption in favour of sustainable development is engaged. This adds further weight in support of the development, which will make a contribution to the housing needs of the District. Taking all of the above into consideration, planning permission should be granted.



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