

**TOWN & COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER
2015 (AS AMENDED) SCHEDULE 2, PART 3, CLASS MA**

23 FARNCOMBE ROAD, WORTHING, BN11 2AY

**PRIOR APPROVAL FOR CHANGE OF USE FROM COMMERCIAL, BUSINESS AND
SERVICE (CLASS E) TO RESIDENTIAL DWELLING (CLASS C3)**



SUPPORTING STATEMENT

11 November 2025

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1. SITE DESCRIPTION

- 1.1 23 Farncombe Road is a two-storey building on the west side of Farncombe Road in Worthing. Originally built as a house, the property has been in commercial use since 1984, when planning permission was granted for change of use from residential to offices (WB/1044/84).
- 1.2 The building walls are constructed in flint with decorative brick quoins and lintels, and a slate covered hipped roof. It is set back from the road behind a bitumen surfaced forecourt, with parking space for three cars, cycling parking and space for refuse bins.
- 1.3 The building has been extended to the rear with the addition of a small, single storey extension.
- 1.4 Abutting the site to the south are the former offices of HSBC UK, and to the north the St John Ambulance training centre.
- 1.5 The building is currently occupied by City Doc, a vaccination centre.
- 1.6 The property is within the Farncombe Road Conservation Area.



Figure 1: Reception



Figure 2: First Floor Rear Consulting Room



Figure 3: First Floor Front Consulting Room



Figure 4: Rear Office

2. PLANNING HISTORY

- 2.1 WB/1044/84 – Change of use from residential to offices. Approved.
- 2.2 WB/08/1127/FUL – Conversion from office building to three self contained flats. Approved
09/01/2009
- 2.3 WB/09/0980 – Change of use from offices to flats. Approved 21/12/2009. Not implemented
- 2.4 WB/09/1090 – Change of use from office r(B1) to dentist surgery (D1). Approved 18/02/2010.
- 2.5 AWDM/1105/14 – Advertisement consent for pole mounted sign. Approved 07/10/2014

3. PROPOSED DEVELOPMENT

- 3.1 This application proposes the change of use of the building from Class E(e) (medical services not attached to the residence of the practitioner) to Class C3 (dwellinghouses) under Part 3, Class MA of the Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended).
- 3.2 The change of use would create a two-bed, three-person dwelling house with a gross internal floor area of 120 sqm with the following accommodation:
- 3.3 Ground Floor: Entrance door leading to living room and cloakroom to side. Doors through to kitchen/dining room and stairs to first floor.
- 3.4 First Floor: One single bedroom (14sqm, 2.5m wide), one double bedroom (14.8sqm), bathroom and study room (6.5sqm).
- 3.5 No external alterations are required to the building to implement the change of use. The front forecourt would be used as it is now, for car and cycle parking, and bin storage.

4. WHY THE PROPOSAL MEETS THE REQUIREMENTS OF PART 3, CLASS MA

- 4.1 Part 3, Class MA of Schedule 2 of the Town & Country Planning (General Permitted Development) Order 2015 (as amended 2020) provides that the following is permitted development:

Permitted development

MA. Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order.

- 4.2 Sub-paragraph MA.1 provides for circumstances where development is not permitted. The proposed change of use does not fall within any of the exclusions, as described below (text from the GPDO in *italics*, response follows).

MA.1.—(1)Development is not permitted by Class MA—

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

Sub-paragraph (2):

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

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

(i) Class A1 (shops);

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

(iii) Class A3 (food and drink);

(iv) Class B1 (business);

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

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

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

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

- 4.3 The premises has been occupied by City Doc (formerly The Sussex Travel Clinic), a medical clinic which is a Class E(e) use, since 2013.

- (d) if land covered by, or within the curtilage of, the building—*
- (i) is or forms part of a site of special scientific interest;*
 - (ii) is or forms part of a listed building or land within its curtilage;*
 - (iii) is or forms part of a scheduled monument or land within its curtilage;*
 - (iv) is or forms part of a safety hazard area; or*
 - (v) is or forms part of a military explosives storage area;*
- 4.4 The site including its curtilage is not within an SSSI, it is not a listed building nor within the curtilage of a listed building. It is not a scheduled monument, nor in a safety hazard or military explosives storage area.
- (e) if the building is within—*
- (i) an area of outstanding natural beauty;*
 - (ii) an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 198156;*
 - (iii) the Broads;*
 - (iv) a National Park; or*
 - (v) a World Heritage Site;*
- 4.5 The site does not fall within any of these designated areas.
- (f) if the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained;*
- 4.6 The site is not occupied under an agricultural tenancy.
- (g) before 1 August 2022, if—*
- (i) the proposed development is of a description falling within Class O of this Part as that Class had effect immediately before 1st August 2021; and*
 - (ii) the development would not have been permitted under Class O immediately before 1st August 2021 by virtue of the operation of a direction under article 4(1) of this Order which has not since been cancelled in accordance with the provisions of Schedule 3. (ii) flooding risks in relation to the building;*
- 4.7 There is no Article 4(1) Direction on this land. Class O was the previous change of use class for B1(a) offices, which has been replaced by Class MA.

5. PART 3, CLASS MA CONDITIONS

5.1 Sub-paragraph MA.2 lists the conditions by which development is permitted under Class MA:

5.2 *2) Before beginning development under Class MA, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to—*

(a) transport impacts of the development, particularly to ensure safe site access;

(b) contamination risks in relation to the building;

(c) flooding risks in relation to the building;

(d) impacts of noise from commercial premises on the intended occupiers of the development;

5.3 The following sections deal with each of these in turn.

(a) Transport Impacts

5.4 The proposed residential dwelling would benefit from the existing off-road parking on the site. The residential use would not materially increase the number of traffic movements over and above the current Class E(e) use.

5.5 Indeed, the residential use will have a materially beneficial impact on traffic flows as it will reverse the AM and PM peak traffic movements (business being inbound AM and outbound PM with residential being the opposite). Given the AM/PM peak flow traffic congestion in and around the town centre this will be a modest, albeit positive, feature of the proposal.

5.6 It is considered that there would be no adverse transport impacts from the development.

(b) Contamination

5.7 There are no known contaminants within the building. The land on which the building is located is not known to be contaminated. The history of use in the building is not one that would lend itself to contamination.

5.8 Contamination risk is therefore considered to be very low, and can be dealt with under the appropriate health and safety legislation.

(c) Flooding Risk

5.9 The site is in Flood Zone 1 for fluvial and pluvial flooding on the EA flood maps, where there is a very low risk of flooding. There are no flood risks present in relation to the building.

(d) Noise

5.10 The site is a quiet suburban area surrounded by office and residential uses. Most of Farncombe Road is residential. There are further residential properties to the rear on Madeira Avenue. The two adjoining uses, the offices and the St John Ambulance training centre, are not noisy uses of land that would be incompatible with the residential use of 23 Farncombe Road. It is concluded that there will be no impacts from commercial premises on the future occupants of the property.

5.11 (e) *where—*

(i) the building is located in a conservation area, and

(ii) the development involves a change of use of the whole or part of the ground floor, the impact of that change of use on the character or sustainability of the conservation area;

5.12 The premises are located in the Farncombe Road Conservation Area. The character of the CA is described as largely residential in the Character Appraisal. By reverting the building back to its original use, the proposal would add, not detract, from the character with the CA, compared to the commercial use. The building retains its attractive domestic appearance, and is more suited to a residential use. The impact on the CA would therefore be positive.

(f) the provision of adequate natural light in all habitable rooms of the dwellinghouses;

5.13 The proposed floor plans show that all habitable rooms would have adequate natural light. Both bedrooms and the living room will have dual aspect windows.

(g) the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;

5.14 The site is not in an area important for general or heavy industry, waste management or storage and distribution.

(h) where the development involves the loss of services provided by—

(i) a registered nursery, or

(ii) a health centre maintained under section 2 or 3 of the National Health Service Act 2006, the impact on the local provision of the type of services lost;

- 5.15 City Doc is a company that operates a number of travel clinics across the UK. ¹ It is the UK's leading group of private medical practices, providing private medical treatments to paying customers. It does not deliver its services under an NHS contract. It is not an NHS maintained health clinic under section 2 or 3 of the National Health Service Act 2006.
- (i) where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building.*
- 5.16 The development does not meet the fire risk condition. The fire risk condition is where the development relates to two or more dwellings *and* is 18 metres or more in height or containing 7 or more storeys.
- 5.17 In addition to the above clauses, Section 3(9A) of the GPDO adds,
- (9A) Schedule 2 does not grant permission for, or authorise any development of, any new dwellinghouse—*
- (a) where the gross internal floor area is less than 37 square metres in size; or*
- (b) that does not comply with the nationally described space standard issued by the Department for Communities and Local Government on 27th March 2015*
- 5.18 The Nationally Described Space Standards (NDSS) advises a minimum gross internal floor area of 70sqm for a two-bed, three-person, two-storey dwelling. The GIA of the dwelling is 120sqm, so providing generous accommodation for three people that is well in excess of the minimum required.
- 5.19 The primary double bedroom must be a minimum 11.5sqm, and at least 2.75m wide for the primary bedroom. Singles bedrooms must be at least 7.5sqm and 2.15m wide. The double bedroom extends to 14.8sqm and is 3.5m wide. The single bedroom is 14sqm and 2.5m wide. The accommodation therefore complies with the NDSS.
- 5.20 The proposed development therefore meets the conditions in sub-paragraphs MA.2 of Part 3, Class MA of the GPDO.

¹ <https://www.citydoc.org.uk/about-us/>

23 Farncombe Road, Worthing, BN11 2AY

Class MA Prior Approval for Change of Use from Commercial to Residential



5.21 In light of the above, we request that the local planning authority grants permission under Part 3, Class MA for the change of use of the building from Class E 'commercial, business and service' to a Class C3 'residential dwelling'.