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Supporting Statement

Rev A (06/02/26)

Re: Change of use from Betting Shop (Class Sui Generis) to Residential (Class C3) to form three dwellings.

at 47 High Street, Haverhill, CB9 8AH

1. Introduction

This supporting statement accompanies the resubmitted prior approval application to West Suffolk Council for the **change of use of part of the building at 47 High Street, Haverhill from a former betting office (sui generis) to three dwellinghouses (Class C3)** under **Schedule 2, Part 3, Class M** of the GPDO 2015 (as amended).

This submission follows refusal of the previous prior approval application, where the Council concluded that the **cumulative floor space changing use exceeded 150 m^2** because it included **stairwell/landings** and **internal partitions/walls** within the calculation.

This resubmission **directly addresses that refusal reason**. The scheme has been amended and the cumulative floor space **changing use is now 147.5 m^2**, i.e. below the statutory 150 m^2 limit.

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2. Site and Location

The application site is on the north-east side of High Street within the town centre shopping parade. The main entrance is from High Street with rear access via Jubilee Walk / Brook Service Road. The property is a two-storey building currently vacant, formerly operated as a William Hill betting office and understood to have ceased trading in 2021.

The site is not a listed building and is not within a conservation area. The site is also not within the restricted designations where Class M is not permitted (including Article 2(3) land, SSSI, safety hazard area, military explosives storage area, scheduled monument).

The proposed change of use relates to the upper floor accommodation formerly used ancillary to the betting office. The ground floor commercial unit is retained.

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3. Relevant planning context

The site benefits from an extant planning permission for change of use from bookmakers (sui generis) to restaurant/hot food takeaway (sui generis) and associated ventilation and shopfront works (ref. **DC/22/2222/FUL**, granted **23 February 2023**).

This is noted as relevant background to the retained commercial element and retained plant/service accommodation shown on the proposed drawings.

The adjoining properties at **49 High Street** and **6 Jubilee Walk** have recently benefitted from prior approval for change of use of upper floors to residential under references **DC/24/1181/P3MPA2** and **DC/24/1182/P3CMA**. These illustrate the established mixed commercial/residential pattern in the immediate town centre context.

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4. Relevant permitted development legislation (summary)

The proposal is made under **Schedule 2, Part 3, Class M** of the GPDO 2015 (as amended), which permits (subject to limitations and conditions) the change of use of a building from a **betting office** (sui generis) to **dwellinghouses (Class C3)**, including building operations reasonably necessary to convert the building.

Class M is subject to the limitation that development is not permitted if the **cumulative floor space of the existing building changing use under Class M exceeds 150 m^2**, or if the development would result in more than 150 m^2 having changed use under Class M.

Class M also requires prior approval consideration (as applicable) in relation to:

- transport and highways impacts;
- contamination risks;
- flooding risks;
- whether the change of use is undesirable due to impact on the adequate provision of certain services (where there is a reasonable prospect of the building being used for such services);
- (where relevant) design/external appearance; and
- adequate natural light to all habitable rooms.

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5. Proposal

The proposal is for the change of use to **3 x 1-bed flats at first floor level**. A dedicated residential access stair/landing serves the flats.

5.1 Cumulative floor space "changing use" – response to previous refusal

The Council previously refused the prior approval because it calculated that the cumulative floor space changing use exceeded 150 m^2, including the **stairwell/landings** and **internal walls/partitions**.

To avoid any repeat of that issue, the resubmitted scheme has been measured **on the same basis as the Council's approach**, i.e. the cumulative floor space changing use includes:

- the internal areas of the flats;
- internal partitions/walls; and
- the dedicated residential access/circulation space (stairwell and landings) serving the flats.

On that basis, the **total cumulative floor space changing use is 147.5 m^2**, i.e. below the **150 m^2** limitation.

5.2 Floor space changing use shown on drawings (Rev C)

The resubmitted drawings (Rev C) show the full area changing use to Class C3 outlined in green, measured at 147.5 m^2. This figure includes internal walls/partitions and includes the dedicated residential access/circulation (stairwell/entrance landing/lobby outside the flat doors). For clarity, the dedicated residential access/circulation area is also shown separately on the drawings and measures 5.7 m^2. This is provided to demonstrate that, consistent with the Council's refusal methodology, the stair/landing/lobby area has been included within the overall 147.5 m^2 "changing use" total. The retained plant/service/vent/void space is expressly excluded because it is not changing use to Class C3, is labelled as retained/non-habitable/maintenance-only, and does not form part of the residential accommodation.

5.3 Flats schedule (flats only)

The proposed flats schedule is as follows:

- **Flat 1 (1B2P): 50.1 m^2**
- **Flat 2 (1B2P): 50.1 m^2**
- **Flat 3 (1B1P): 39.4 m^2**
- **Total flats (excluding access circulation): 139.6 m^2**

The difference between the flats-only total and the 147.5 m^2 "changing use" total is accounted for by the **dedicated access/circulation (stairwell/landings)** and internal partitions/walls, consistent with the Council's refusal methodology.

5.3 Retained plant/vent/service/void space (excluded from “changing use”)

The scheme has been amended so that an existing plant/vent/service space is **retained** and left outside the Class C3 conversion. This retained space is shown on the revised drawings as **plant/service/void accommodation** and is **not included within any flat** and is **not proposed for residential occupation**. As it is **not changing use to Class C3**, it is excluded from the cumulative floor space “changing use” calculation.

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6. Prior approval matters

6.1 Transport and highways impacts

The site is in a sustainable town centre location with good access to services and public transport. Bus stops are within short walking distance serving multiple routes (including 13/13A/14/14A/14B/15A/321). Given the nature of the proposal (3 x 1-bed dwellings) and its central location, it is not expected to result in any unacceptable highways impact. Secure cycle storage is provided for the flats.

6.2 Contamination risks

The site is an existing town-centre building in established commercial use. There is no evidence before the applicant to indicate contamination that would prevent residential use of the upper floor. If the Council considers any further information necessary, this can be addressed through proportionate investigation/mitigation.

6.3 Flooding risks

The site lies within **Flood Zone 1** and therefore has a low probability of flooding from rivers and the sea. The proposal is a change of use within an existing building, and the residential accommodation is at **first floor level**, which further reduces flood vulnerability.

6.4 Impact on provision of services (Class M.2(1)(d))

The ground floor commercial unit is retained. The proposal relates to upper floor accommodation and does not remove an active ground floor service use. In these circumstances, it is not considered undesirable for the building to change use to Class C3 by reason of any material impact on the adequate provision of services of the sort referenced in Class M.2(1)(d).

6.5 Design / external appearance

The proposal involves internal reconfiguration to create dwellings within the existing envelope. Any external alterations are limited and appropriate to the host building and town centre context.

6.6 Adequate natural light

The proposed layout provides windows serving each habitable room. The submitted drawings demonstrate that each habitable room benefits from natural light consistent with the prior approval requirement.

6.7 Waste and recycling

Waste and recycling storage will be provided and managed in accordance with the Council's collection requirements. Storage is located close to the main entrance and can be presented for collection without obstructing the public realm.

6.8 Noise (brief note)

The building sits within a mixed-use town centre where upper floor residential accommodation above commercial premises is common. Building Regulations upgrades for sound insulation and fire separation will be implemented as part of the conversion works, which will mitigate noise transmission between the retained commercial unit and the flats above.

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7. Conclusion

This resubmission directly addresses the Council's previous reason for refusal. The proposal has been revised and the cumulative floor space changing use under Class M is now **147.5 m^2**, calculated on the same basis as the Council's previous assessment (including stairwell/landings and internal partitions/walls). The retained plant/service/void space is excluded because it is **not changing to Class C3** and is not part of the residential accommodation.

It is therefore considered that the proposal complies with the limitations and prior approval requirements of **Class M** and that prior approval should be granted.