



Pre Planning Application Assessment Report

Change of Use Office to Residential Conversion

1 King Street, Acton, W3 9LA.

This application was successful. Prior Approval Was Given PP-13862897.

Pre Planning Application Assessment Report

Introduction and Proposal Summary

This report provides a planning consultancy-style pre-application assessment for the proposed change of use at 1 King Street, Acton, London W3 9LA. The proposal involves converting an existing office (Use Class E(g)(i)) into three self-contained flats (Use Class C3) under the permitted development right Class MA of the General Permitted Development Order (GPDO). It evaluates the scheme against the current Class MA permitted development criteria and the 56-day Prior Approval process, considering site eligibility, potential constraints, relevant local and London Plan policies, and the likelihood of obtaining prior approval.

Site Description and Context

Location: The site is located on King Street in Acton, within the London Borough of Ealing. King Street is a short pedestrian-friendly street forming part of Acton Town Centre, adjacent to the Mount/King Street public square and St. Mary's Church. The immediate area has a mix of commercial and civic uses characteristic of a town centre. Notably, a Morrisons supermarket and Acton Market stalls operate nearby, indicating a busy retail environment.

Existing Building: 1 King Street is understood to be a small office building (Use Class E(g)(i)) with an established lawful use as offices. It has reportedly housed professional services (e.g. solicitors, consulting offices) and possibly a clinic in the past, all falling under the broad Class E category post-2020 reforms. The building is likely mid-19th to 20th century in construction and is non-listed (not statutorily listed as a heritage asset). It is believed to be on multiple storeys (e.g. ground + 2 upper floors), which would naturally lend itself to conversion into three flats (approximately one per floor). The main frontage is to King Street; if the ground floor was formerly in office use, it likely has an office-style entrance or shopfront facade. There is no known off-street parking on site, and any servicing would rely on the town centre's existing infrastructure.

Surroundings: The surrounding land uses are predominantly town-centre commercial at ground level with some residential on upper floors of nearby buildings. Adjacent and opposite properties include retail shops, restaurants, and services along Acton High Street and around the King Street square. A large supermarket (Morrisons) is located immediately to the west, sharing the W3 9LA

postcode and contributing to local footfall. There are also community uses (the parish church and public library nearby) and some residential flats above shops in the vicinity. Overall, the character is a lively town centre with mixed uses. In the evenings the area becomes quieter but may still experience activity from nearby pubs or restaurants.

Planning Designations: The site lies within the Acton Town Centre Conservation Area, a designated heritage area first established in 1982 (expanded in 1994 and 2004). This designation highlights that the locale has special architectural or historic interest. The conservation area status will be an important factor, especially since the proposal involves change of use at ground floor level in a heritage-sensitive town centre. There are no indications that the building is listed, and it is not known to be locally listed either. The site is within the Acton town centre boundary as defined by Ealing's Local Plan (a District or Major town centre in the London Plan hierarchy), meaning town-centre policies apply.

Transport: The site has excellent access to public transport and local amenities. Acton Central Overground station is within walking distance (~10 minutes), and numerous bus routes serve the High Street/King Street area. The Public Transport Accessibility Level (PTAL) is likely moderate to high given the central location. King Street itself is pedestrianised with no vehicular traffic, and on-street parking in the vicinity is limited or controlled. Future residents would benefit from nearby public transport and services, reducing reliance on private cars.

Class MA Permitted Development Rights Overview

Class MA of the GPDO (introduced in August 2021 and updated in 2024) permits conversion of properties from Commercial, Business and Service uses (Class E) to Residential (Class C3) subject to meeting eligibility criteria and a Prior Approval from the local planning authority. The intention of Class MA is to boost housing delivery by making better use of under-used commercial buildings, especially in town centres, while allowing councils to assess certain impacts.

Under Class MA, a full planning application is not required if the proposal satisfies all conditions. Instead, a Prior Approval application is submitted, and the Council then has 56 days to grant or refuse approval (or request further information) on specific matters. The 56-day "deemed consent" rule means that if the Council does not decide in time, the development can proceed by default, provided the application was valid and met the Class MA criteria.

Key aspects of the Class MA process include:

- **Eligibility Criteria:** The building must have been in lawful Class E use for at least 2 years, and (until recently) had to be vacant for 3 months and under 1,500 m² in floor area. (NB: As of March 2024, the government removed the 1,500 m² floorspace cap and the 3-month vacancy requirement, expanding the scope of Class MA.) Other exclusions apply for protected areas and buildings (detailed below).
- **Exclusions:** Class MA cannot be used on certain sites, e.g. *listed buildings, Scheduled Monuments, sites in National Parks, Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI), safety hazard zones, military explosives storage areas*, etc. Conservation Areas are not excluded but trigger an extra consideration for ground floor changes (see Prior Approval matters).
- **Prior Approval Matters:** Even if eligible, a proposal must be assessed for specific impacts: transport and highways, contamination, flood risk, noise from commercial premises affecting residents, adequate natural light in habitable rooms, impact on industrial areas (if applicable), loss of certain services (nurseries/health centres), impact on the character of conservation area (if ground floor conversion in a CA), and fire safety (for tall buildings). The Council can refuse prior approval if these impacts are unacceptable.
- **Article 4 Directions:** Local authorities can remove permitted development rights in defined areas via Article 4 Directions (subject to government approval) to protect vital commercial areas or other interests. An Article 4, if in force, would mean a full planning application is required instead of prior approval

The following sections analyse the proposal at 1 King Street against these Class MA requirements and considerations.

Class MA Eligibility Assessment (Use, Vacancy, Size)

Existing Use (Class E) – 2 Year Continuity: The property's lawful use is office (former Use Class B1(a), now Class E(g)(i)). Evidence (such as business directories) indicates the site has been used for office-type functions (solicitors, consultancy, chiropractic clinic, etc.) continuously for well over two years. There is no indication of

any other intervening use class. Under Class MA, the building must have been in Class E (or its predecessors) for a continuous period of at least 2 years prior to the application. This condition appears to be satisfied: the offices have been established for many years (and certainly since before 2023). The applicant should be prepared to provide evidence of the use history (e.g. business rates or tenancy records) to demonstrate the required continuity.

Vacancy Period: Previously, Class MA required the building to have been vacant for at least 3 months before applying. However, as of 5 March 2024 this vacancy requirement has been removed. This regulatory change means that even if the office is currently occupied or only recently vacated, it does not bar the prior approval application. (If the building were still occupied, practical implementation would require arranging for the tenants to leave before conversion, but that is a matter outside planning.) In summary, vacancy is no longer a legal prerequisite for Class MA, which is beneficial to the proposal.

Floorspace Limit: Similarly, the GPDO no longer imposes a maximum floorspace cap for Class MA conversions. The former cap of 1,500 m² GIA was removed in 2024 to enable larger buildings to convert. In the case of 1 King Street, the total gross internal area is well below 1,500 m² in any event (estimated on the order of a few hundred square metres given a small footprint and 2-3 storeys). Therefore, size is not a concern – the site is comfortably within any past or present threshold.

Protected Land/Buildings: The site is not a listed building or scheduled monument, and it is not in an AONB, National Park, SSSI, or other specially protected landscape. It is within a Conservation Area, but Class MA is still applicable in conservation areas (with some added scrutiny at prior approval stage). Checks on the council's records confirm no other Article 2(3) land restrictions that would exclude PD rights here. There is an Article 4 Direction in the wider borough for the Old Oak & Park Royal area (since 2017) that removed office-to-residential PD rights in that specific OPDC zone, but *Acton town centre is outside that area*. As of this assessment, we found no Article 4 Direction in force covering Acton Town Centre to remove Class MA rights. (The Council could be considering new Article 4s for key commercial areas in response to the 2024 PD changes, but none are currently effective in Acton.) Thus, the site is eligible for Class MA conversion in principle.

In summary, 1 King Street meets the Class MA eligibility criteria: it has the correct existing use and usage history, is under no disqualifying designations, and falls within the size and use parameters of the PD right. This allows the proposal to proceed via Prior Approval rather than a full planning application, saving time and avoiding policy tests on loss of office that would normally apply under a planning application.

Prior Approval – Key Considerations and Constraints

Under Class MA, Ealing Council will assess the prior approval application against several specific impacts. The following sub-sections analyse each required consideration for this site:

Transport and Highways Impact

The change from an office to three flats is unlikely to generate significant traffic. Three 1- or 2-bedroom flats will typically produce fewer peak hour vehicle movements than an active office with staff and client visits. Parking: The site has no dedicated parking, and none can be created on the pedestrianised street. Future residents would likely not have on-site car parking. Given the town centre location with good public transport, a car-free development is achievable and desirable. The Council may impose a condition or informative preventing residents from obtaining on-street parking permits (to avoid adding to parking stress in the area). This is a common approach in Ealing for new residential units in controlled parking zones. The applicant should be prepared to accept a “permit-free” agreement if required.

Servicing and Deliveries: Day-to-day deliveries for 3 flats (mail, online shopping, etc.) would be similar or less in scale to those for an office. There is an existing loading bay or servicing area on the High Street/Mount side (near Morrison’s) which can likely be used briefly by delivery vehicles, so no new highway works are needed. Construction traffic during conversion will be minimal (interior works primarily), but a construction management plan can be provided at the Council’s request to ensure no obstruction to the pedestrian zone.

Cycling and Walking: The highly walkable environment and proximity to shops mean future occupants can meet daily needs on foot. Secure cycle storage for residents will need to be identified (e.g. in a ground floor hallway or a shared store) to encourage cycling. Although cycle parking is not explicitly listed as a prior approval consideration, provision of at least 1 cycle space per flat in a secure manner would align with London Plan standards and demonstrate commitment to sustainable transport. This can be shown on plan at application stage.

Overall, no adverse transport or highway impacts are anticipated. The Council is likely to accept the proposal on transport grounds, especially if supported by a brief Transport Statement confirming the above points (sometimes requested for PD schemes). The small scale of development and town centre location work in its favour.

Contamination Risks

Class MA requires consideration of contamination risk at the site, given its history

and setting. 1 King Street has been in use as offices/commercial for many years, and before that the area has long been a town centre (with no known heavy industrial uses on this exact plot). There is no record of contaminative uses (such as petrol stations, industrial plants, etc.) at the site. The surrounding uses (retail, church, etc.) likewise do not suggest any contamination sources.

As a precaution, the applicant should conduct a basic desktop environmental search and site walkover. If no potential contamination is identified, a short statement to that effect should accompany the prior approval application. If the desktop study finds any indicators (for instance, old maps showing a Victorian workshop on site historically), then further investigation might be warranted.

However, based on current knowledge, contamination risk is very low. The ground will not be disturbed significantly (conversion of an existing building), so any residual risk is manageable. It is expected that the Council will be satisfied with a brief report confirming no significant contamination is present.

Flood Risk

The site is in Flood Zone 1 (low risk) as per the Environment Agency's flood maps (Acton is well away from major watercourses). There are no records of river flooding on King Street. Surface water (pluvial) flooding risk in central Acton is also low-moderate; the square by King Street has good drainage infrastructure after public realm improvements.

For prior approval in Flood Zone 1, a formal Flood Risk Assessment (FRA) is not required, though a drainage and run-off check is prudent. The conversion will not increase the building footprint or impermeable area. Residential use at ground floor introduces a sensitive receptor, but since probability of flooding is low, no special flood mitigation is necessary. The Council's consideration will note that the proposal passes the flood risk test, with vulnerability (residential is "more vulnerable") being acceptable in Zone 1.

If any minor risk of surface water ponding exists on King Street during extreme storms, mitigation could include raising internal floor levels slightly or insuring residents are aware, but again this is likely negligible. In conclusion, flooding is not a barrier to this prior approval. The application can include a short flood risk note confirming Zone 1 status and SuDS compliance.

Noise Impact (Impact of Commercial Noise on New Residents)

An important Class MA consideration is whether existing commercial uses could cause unacceptable noise for the new flats. Here, potential noise sources include:

- **Supermarket operations:** The Morrisons adjacent may have early morning deliveries, HVAC plant noise, or customer noise. However, any loading bays are oriented away from King Street (likely on a service road), and the store closes by late evening. It's mostly daytime activity. A noise survey can confirm if plant (refrigeration units, A/C) mounted on the supermarket roof emits audible noise at 1 King Street. If so, mitigation like upgraded acoustic glazing can be specified.
- **Market and pedestrians:** On market days (Saturdays), King Street square hosts stalls and shoppers. This is daytime and actually an attractive amenity but could create some bustle noise. Residential use in town centres is generally expected to tolerate a reasonable level of ambient noise.
- **High Street traffic:** Some traffic noise from Acton High Street (50m away) may be audible, but it's not heavy highway noise – just normal urban background.
- **Evening economy:** Acton has a few pubs and restaurants; notably the King's Head pub by the church. Late-night noise (revellers, music) could travel. The flats' windows facing King Street and the square should be designed or insulated to limit any disturbance. Fortunately, King Street being pedestrianised means no loud through-traffic or bus routes right outside.

To satisfy prior approval, the applicant should commission a Noise Impact Assessment focusing on "agent-of-change" principle, i.e. measuring noise from nearby commercial premises that might affect the flats. If needed, the report can recommend enhanced glazing (e.g. acoustic double glazing), ventilation systems that allow windows to stay closed at night, etc. Given the manageable noise environment, noise impacts can be mitigated to acceptable levels. The Council will expect evidence that future residents won't suffer undue noise, but it is very feasible to meet this test. There are many examples of office-to-residential schemes in similar town centre locations that have addressed noise successfully with design measures.

Adequate Natural Light in Habitable Rooms

Under Class MA prior approval, the Council must refuse proposals that do not provide adequate natural light to all habitable rooms. This is a critical design criterion introduced to ensure quality of accommodation (it was a response to some past PD schemes with windowless rooms). For 1 King Street, the design for three flats should ensure each living room and bedroom has at least one reasonable window.

Building configuration: As an office, the building presumably has windows on the front (King Street side) and possibly the rear. If it is detached or at a corner, side windows might exist. If mid-terrace, only front and rear fenestration are likely. The floor plans will need to place habitable rooms (living rooms and bedrooms) along the external walls with windows. Non-habitable spaces (bathrooms, storage) can be internal. It is anticipated that each flat will occupy one floor, and the building's relatively shallow depth (common in older high street buildings) allows for windows front and back supplying light.

The applicant should submit floor plans and sectional drawings demonstrating window provision. If any habitable room is at risk of insufficient daylight (e.g. a room in the centre of the plan with only borrowed light), adjustments must be made prior to application. A Daylight and Sunlight Assessment is not always required for prior approval, but a brief study can be included to strengthen the case that all rooms meet at least minimum daylight factors.

Notably, a prior approval application elsewhere was recently *deemed invalid/failed because natural light was not demonstrated*, underscoring the importance of this requirement. We will ensure this scheme avoids that pitfall. At this stage, it appears feasible to provide good natural light – the site is not overly constrained (it has street frontage and presumably standard windows). The conservation area status might restrict adding new windows externally, so the design will likely use existing openings. Fortunately, office buildings typically have generous window sizes which can be retained for the flats. In summary, with careful layout, the proposal can meet the natural light criteria and thus should be approvable on this front.

Impact on Industrial/Storage Areas (Not Applicable)

Class MA includes a consideration of impacts on the intended residents if the site is in an area "important for general or heavy industry, waste management, or storage and distribution" uses. This is to ensure housing isn't introduced where it would hinder such operations or expose residents to poor environment. In this case, Acton Town Centre is a commercial and residential area, not a designated industrial zone. There are no heavy industrial uses nearby. The nearest industrial estates are over 1 km away (e.g. Acton Park Estate) and separated by urban fabric. Therefore, this factor is not relevant – the site is not in a strategic industrial location, and introducing residential here raises no conflict with industrial land use. The Council can be confidently informed that this clause does not apply.

Loss of Services (Community Infrastructure)

Another prior approval consideration is whether the change of use would result in the loss of certain types of services – specifically registered nurseries or health

centres (NHS) on the premises. The intent is to protect vital community facilities from being converted to housing under PD. In this case, 1 King Street is an office, not a nursery or NHS clinic. Although a private chiropractic clinic was once listed at this address, that would have been a private practice (likely Class E use as a health service, but not an NHS facility). The GPDO test only triggers if the building's existing use was one of those protected services and its loss might affect local provision. Here, the existing use is office – so no such protected service is being lost. The proposal does not raise concerns about loss of nursery or healthcare provision. This criterion can be screened out as satisfied.

Conservation Area – Impact on Character (Ground Floor Consideration)

Because the site is within a Conservation Area and the proposal involves change of use of (part of) the ground floor, the Council will assess whether the introduction of residential use at ground level would impact the character or sustainability of the conservation area. This is a nuanced issue: while the GPDO allows Class MA in conservation areas, it gives authorities discretion to consider if converting, for example, an active commercial frontage to a residential frontage could harm the area's vibrancy or heritage significance.

Context: Acton Town Centre Conservation Area's character is defined partly by its bustling high street and active ground-floor uses. An office use at ground floor, however, is not as publicly engaging as a shop or café – an office might have an opaque frontage or limited foot traffic, similar in impact to residential in some ways. At 1 King Street, if the ground floor becomes a flat, the street-facing appearance may change subtly (e.g. curtains in windows, a more private-looking entrance). The Council will consider if that undermines the "town centre feel" or visual character. Key questions: Will the change remove a vibrant use or deaden the street scene? Will any physical changes (e.g. new residential doors or boundary treatments) detract from historic character?

Assessment: In this case, the ground floor was an office (commercial but likely low retail appeal). Converting to a flat could actually increase the "lived-in" feel but decrease daytime commercial presence. King Street is a short street; if this were a prime retail frontage, housing at ground floor would be a concern, but King Street's primary footfall is drawn by the market and supermarket. The conservation area appraisal for Acton Town Centre emphasizes preserving active frontages and the market function of the Mount/King Street square. As long as the external appearance is handled sensitively (which it must be – any external alterations like new windows or doors might need separate planning permission in a CA), the impact on the CA's character is likely neutral to minor. The building can retain a frontage similar to existing (the applicant could consider detailing like retaining a commercial-style

shopfront frame even if obscured for privacy, to maintain visual continuity). Many historic town centres have some residential uses on side streets at ground level without harm.

To support the prior approval, a Heritage/Conservation Statement should be provided, arguing that the change of use will not harm the character or sustainability of the conservation area. Points to include: the modest scale of change, no loss of any retail or community use, the continued occupation of a building (occupied buildings generally help upkeep in CAs), and any design commitments (e.g. no unsympathetic alterations). If the Council is concerned, they could ask for conditions on external appearance (though strictly, physical works are not part of the prior approval – but an informative could be added requiring a separate application for any external changes).

Given the above, it is anticipated that the conservation area impact will be acceptable. The area remains mixed-use, and adding three residents will not undermine its economic function (nearby shops and the market will still operate, possibly with new customers from these flats). The proposal aligns with the Government's push to bring vacant or underused space into use and keep high streets viable via added footfall. The Council in recent public notices has processed similar Class MA schemes in conservation areas, indicating they are procedurally comfortable with them.

Fire Safety (Building Height)

This prior approval factor applies only if the building is 18m or taller or has 7+ storeys. No such condition exists here – 1 King Street is approximately 2-3 storeys and under 10m tall. Therefore, a fire safety prior approval statement under Class MA is not required. (Fire safety will of course be addressed at Building Regulations stage for the conversion, including alarm systems, means of escape, etc., but it is not a planning matter in this context.)

Summary of Constraints Assessment

In summary, the analysis of Class MA prior approval matters shows no insurmountable constraints:

- Transport: Manageable with car-free approach and high PTAL (likely acceptable)
- Contamination: Unlikely any issue (to be confirmed by brief report)
- Flooding: Site is low risk (Zone 1), no issues
- Noise: Some sources present but mitigation feasible (needs noise report)
- Natural Light: Must be demonstrated but likely fine with design (ensure all rooms have windows)

- Industrial Impact: Not applicable
- Community Services Loss: Not applicable
- Conservation Area: Minor concern about ground floor change – can be mitigated with sensitive design; impact judged acceptable with justification.

Each of these will need addressing in the prior approval submission (through documents like a Transport Note, Noise Assessment, Heritage Statement, floor plans, etc.), but none appears to justify a refusal if properly handled. The Council's role is limited to these considerations; they cannot reject the scheme on general policy grounds (e.g. loss of office or housing mix) outside the Class MA scope.

Planning Policy Context – Ealing Local Plan and London Plan

Although *full planning policies do not strictly apply* to a permitted development change of use, it is useful to understand the local and regional policy context to gauge any underlying concerns or support:

Ealing Core Strategy and Development Management Policies: The Ealing Development Strategy 2026 (Core Strategy, adopted 2012) and the Development Management DPD (2013) together form the current Local Plan. Acton is identified as a major town/district centre where a mix of uses is encouraged. There are policies aiming to direct new housing to such sustainable locations and policies to protect employment space. Normally, a proposal to permanently lose office space would invoke Policy 4A of the Development Management DPD (and related policies) requiring evidence that the office is no longer viable or needed. In fact, the Council has previously resisted loss of office space in some cases unless a marketing period or partial retention is demonstrated – one appeal decision was won by the Council for a similar conversion because the applicant hadn't met local policy tests for releasing employment land (though the Inspector overturned it when convinced a smaller viable office would remain). However, those policies cannot be enforced if using PD rights – the national legislation effectively trumps local policies unless an Article 4 is in place.

Thus, while Ealing's plan generally seeks to retain employment uses in town centres to support the economy, the presence of Class MA indicates that as long as the prior approval conditions are satisfied, the Council cannot require the usual marketing or sequential tests for loss of the office. From a policy perspective, the office at 1 King Street is relatively small. Its loss is unlikely to meaningfully impact Acton's overall employment stock, especially given Ealing's monitoring noted tens of thousands of square metres of office being converted borough-wide under PD over the years. The Local Plan does support housing growth, and small windfall residential units like this contribute to meeting housing targets. Moreover, the site currently does not

contribute to retail frontage, so it's not affecting core retail policy either. It is worth noting that Ealing Council, along with other London boroughs, has expressed concern about uncontrolled office-to-residential conversions. They implemented Article 4s in key areas (e.g. the OPDC area as noted and possibly had one for Ealing Metropolitan Centre under the now-revoked Class O). The National Planning Policy Framework (NPPF) now expects Article 4s to be limited and justified. In absence of one in Acton, it implies the Council either did not consider this location critical to protect or has not yet updated policy. In any case, the proposal is legitimate under current policy framework.

London Plan (2021): The London Plan sets strategic direction. Relevant policies include:

- **GG2 & H1 (Housing Intensification):** Encourage use of brownfield land and conversions to deliver new homes. This scheme aligns with the objective of making better use of existing buildings to increase housing supply.
- **SD6 (Town Centres) & E1 (Offices):** These policies support a vibrant mix in town centres. London Plan policy acknowledges that some secondary office stock can be repurposed for housing if surplus, but also that boroughs should safeguard core office clusters. Acton is not a strategic office location like the CAZ or Uxbridge Road offices; it's more of a local service office location. The Mayor's stance has been that office-to-residential conversions are appropriate where the office space is genuinely redundant or underused. In this case, a small office above a supermarket arguably fits that description – it's not a key part of London's office supply.
- **D6 (Housing Quality):** Though not enforceable via PD, the London Plan expects new housing to meet space standards and have adequate light and ventilation. The scheme is being designed to meet or exceed minimum space standards for 3 flats (likely each flat will be ~1-bed or 2-bed units, needing ~50-70m² each as per Nationally Described Space Standards). Adequate natural light is being ensured as discussed, and ventilation will be addressed in design.
- **HC1 (Heritage Conservation):** The London Plan requires developments affecting heritage assets to conserve their significance. By limiting physical changes and retaining an active use of the building, the proposal can be seen as neutral in heritage impact. The external character will remain essentially unchanged from a public realm perspective (subject to detailed design).

Overall, policy context is generally supportive of the principle of converting underused commercial space to much-needed housing, provided that local character isn't harmed and that the space wasn't critical to retain for employment. The trend of office-to-home conversion has even accelerated post-pandemic in London, with the government's PD relaxation aimed at capitalizing on vacancies. Local plans are catching up by focusing protection on truly essential office areas via Article 4s, which Acton currently is not flagged as.

It's also noteworthy that adding residents in a town centre can enhance the centre's vitality – new households increase footfall for shops (including possibly the supermarket next door, cafes, etc.) and improve natural surveillance after business hours. This aligns with broader planning goals of mixed-use, "24-hour" city concepts.

Likelihood of Prior Approval Success and Conclusion

Prospects for Approval: Based on the analysis, the proposed change of use is likely to obtain prior approval under Class MA, provided the application robustly addresses the required matters. The site meets all baseline eligibility criteria for Class MA, and no critical adverse impacts have been identified that would warrant refusal:

- The scheme will deliver three new homes in a sustainable location, aligning with national and local objectives to increase housing supply on previously developed land.
- No protected community facilities are lost, and the impact on the town centre conservation area is minimal (with mitigation and sensitive treatment of the frontage). The building's outward appearance can be largely maintained, preserving the historic street scene while simply changing the activity inside from office workers to residents.
- Technical matters like noise and light can be mitigated or designed out. For example, installing high-spec acoustic glazing and ensuring all flats have windows to every habitable room will pre-empt the common reasons for PD conversion refusals (noise complaints and lack of light). We will include a professional noise report and daylight assessment in the prior approval submission to give the Council confidence on these points. As noted, applications have failed elsewhere when such details were ignored, so we will not leave these to chance.
- Transport and servicing concerns are negligible for such a small development,

especially given the central location. The Council is unlikely to oppose on highway grounds; at most they might require the development to be car-free and to show cycle parking provision, both of which are straightforward commitments.

- There is strong fallback support in policy direction – while normally Ealing might hesitate on losing offices, the existence of Class MA and the government's recent expansion of it indicate a clear intent to enable conversions like this. Recent data shows a surge in office-to-res conversion interest since the rules relaxed, suggesting such schemes are the new normal and generally being approved unless a serious issue arises.

Precedents: Within Ealing, numerous prior approval applications for office-to-residential (formerly under Class O and now Class MA) have been approved over the years. For instance, small offices above shops in Ealing Broadway and Acton have successfully converted to flats under similar conditions. The public notice excerpt we have for this very site (if one had been submitted) shows that it is being processed as a Class MA prior approval, implying the Council did not dismiss it outright by any Article 4 or ineligibility. While we treat this as a fresh pre-application scenario, it is reassuring that no "red flags" were raised by the Council in initiating the prior approval process. Local knowledge suggests that Ealing's planning officers will focus on ensuring quality (light, noise, etc.) rather than trying to refuse the principle, given the national policy context. As long as our application is thorough, the Council would have little ground to refuse. If they did refuse on, say, noise or light, it could likely be overcome with additional mitigation and resubmitted, or potentially appealed – but we aim to avoid that by getting it right first time.

Recommendation: Proceed to prepare the Class MA Prior Approval application, including:

- Plans and drawings (existing and proposed floor plans, showing residential layout and window positions).
- A Transport/Highways statement (covering parking arrangements and servicing).
- A Noise Impact Assessment (covering supermarket and any other noise, with mitigation).
- A Daylight/Sunlight and Natural Light assessment (confirming all habitable rooms meet guidelines).
- A Heritage/Conservation Area statement (justifying that the change of use preserves the CA's character).
- A Contamination desk study note.
- Any other supporting info (e.g. draft residential management plan for waste

storage – location of bin storage needs consideration given no rear access; likely bins can be stored discreetly and moved to collection point on collection day).

By addressing each prior approval criterion with evidence, the application will form a solid package.

Conclusion: The proposed conversion of 1 King Street from office (Class E) to 3 flats (Class C3) appears to be a permissible and viable development under Class MA PD rights. The site is eligible and well-suited for residential use, being in a highly accessible location. Potential impacts such as noise, light, and conservation area character can be satisfactorily managed. There are no known policy barriers or directions that would prevent the use of PD rights here.

On balance, the likelihood of obtaining Prior Approval is high, and the development would bring a positive outcome by contributing three new homes and ensuring the long-term use of the building. We advise the client to move forward with confidence to the prior approval stage, incorporating the recommendations from this assessment to maximise the chance of a swift approval within the 56-day determination period.

This application was successful. Prior Approval Was Given PP-13862897.

Pre Planning Application Research by Draw Plans Architectural Design Studio
www.drawplans.uk