 Reigate & Banstead BOROUGH COUNCIL Banstead Horley Redhill Reigate	TO:		PLANNING COMMITTEE
	DATE:		9 th March 2022
	REPORT OF:		HEAD OF PLANNING
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AGENDA ITEM:	6a and 6b	WARD:	RGT - Reigate

APPLICATION NUMBER:		A) 21/00468/F B) 21/00469/LBC	VALID:	11/03/2021 11/03/2021
APPLICANT:	Skelton Developments (Nottingham) Limited		AGENT:	Quod
LOCATION:	THE OMNIBUS BUILDING LESBOURNE ROAD REIGATE SURREY RH2 7LD			
DESCRIPTION:	External alterations comprising 8 no. conservation rooflights. As amended on 16/02/2022			
All plans in this report have been reproduced, are not to scale, and are for illustrative purposes only. The original plans should be viewed/referenced for detail.				

SUMMARY

This is a full planning application and Listed Building Consent application for the insertion of 8 conservation rooflights to the second floor of The Omnibus Building. The building is located on the northern side of Lesbourne Road in Reigate and is Grade II listed, being a former Bus Garage designed by Wallis Gilbert and Partners and built in 1931 with its northern elevation and roof designed particularly to respect the setting of the Church Fields area to the north, and it now playing a role in the setting of the Chart Lane Conservation Area. The surrounding area is characterised by predominantly residential uses with some commercial uses to the south, and open land to the north.

The proposed rooflights would be of similar style to others found on the building, with some variation in terms of width in order to correspond with first floor windows below. The rooflights would be contained within the north elevation of the building. Their purpose is stated as being required to allow for the provision of a greater degree of natural light to the office space occupying the second floor, which is currently vacant, as well as allow for improved outlook for any future occupiers of the building, in accordance with required standards. It is argued by the applicants that the proposed improvements to the building would bring significant economic benefits that should be afforded significant weight, highlighting in particular the bringing back of a high quality employment space into use, which could be suitable for use by a local business or a new business to the borough, with space to accommodate between 30-40 full-time

equivalent jobs, the increase in spending locally by employees and the contribution of this to the local economy, as well as additional business rates revenue generated, and increased productivity of employees.

It is accepted that, whilst the office space is vacant it is not currently contributing to the economy of Reigate, and that there would be benefits in bringing the office space back in to use which may be assisted by the proposal. However the current situation is not an absolute impediment to the office space being usable and it has not been fully demonstrated that alternatives have been properly explored to let the space at a lower cost or to find less harmful solutions to improve their outlook and lighting. It is therefore considered that the benefits claimed would not outweigh the level of harm to the character of the Grade II listed building in this instance.

The Omnibus building has been significantly altered over the preceding decades, particularly to the south side of the building, not least the creation of a glazed atrium and entrance, granted in 1997, to accommodate the conversion of the building to offices. At the time of these previous applications, care was given to avoiding the insertion of dormer windows and rooflights on the northern side of the building in order to protect its powerful roof scape, and the creation of the glazed atrium was seen as a way to achieve this. It is clear however that this has been poorly designed with regard to allowing for light penetration to certain parts of the internal space.

Whilst accepting that the building needs improving in this regard, to maximise potential of the upper floor, it is the view that this could be achieved without needing to further harm the last remaining elevation of the original building. The north elevation has a clean, unbroken roofscape, clearly visible from the north and providing an attractive setting for the Chart Lane Conservation Area. It is officers view that a less damaging alternative would be for rooflights to be added on the hidden southern plane of the roof, out of view of the street scene or the ground level as they would be hidden by the southern office block and provide additional light. The applicants have expressed concern regarding the overheating potential of this and the costs associated with measures to mitigate against this. Further internal alterations to the layout of the building and increasing the size and width of the atrium would be required to provide light more generally to the building, which is an issue across all floors, as well as improving outlook.

It is accepted that the proposal would provide economic benefit associated with enabling the tenanting of the upper floor offices. However, harm would result by virtue of the punctuation of the impressive, clean and unbroken northern roofscape which currently exists and is a defining feature of the listed building and provides an important backdrop to the Chart Lane Conservation Area.

Overall therefore the economic benefits are not considered to outweigh the harm to the listed building and setting of the conservation area, especially as it is considered that there are alternative (less harmful) solutions that have not been fully explored or ruled out on the basis of cost.

RECOMMENDATION

Planning permission is **REFUSED** for the following reason:

1. The proposed insertion of 8 conservation rooflights in the roof of the north elevation of the building would result in the cluttering of this large expanse of clean and unbroken roof which is a distinctive feature of the building and contributes positively to the setting of the Chart Lane Conservation Area. The proposal would therefore result in harm to the character and integrity of the Grade II listed building and the setting of the Conservation Area. The benefits of the proposal are not considered to outweigh this harm and the proposal is therefore contrary to the National Planning Policy Framework 2021, Policy CS4 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and NHE9 of the Reigate and Banstead Development Management Plan 2019.

Consultations:

Conservation Officer: Objection raised. This is discussed in detail later in this report.

Twentieth Century Society: in response to the proposal for 9 dormer windows, Objection was raised, and refusal recommended. Comments were made as follows:

The uninterrupted steeply -pitched tile roof is a key part of the buildings special interest. The north side of the roof is particularly significant, being designed to provide a plain “backdrop”, as the CA (Conservation Area) appraisal puts it, to the open spaces that characterise the Chart Lane Conservation Area. We agree with the Councils Conservation Officer that the insertion of dormer windows will harm the buildings appearance and character and will have a detrimental impact on the conservation area. For these reasons we encourage the Local Authority to refuse the application.

Re-consultation took place with regard to amendments to provide 8 conservation rooflights on 17.2.2022. No response has been received to date.

Representations:

Letters were sent to neighbouring properties on the 12th March 2021 with respect to both applications. One letter of objection was received raising the following issues:

Issue	Response
Harm to the Listed Building	Paragraph 6.2-6.10

1.0 Site and Character Appraisal

- 1.1 This is a grade II statutory listed building, a former Bus Garage designed by Wallis Gilbert and Partners and built in 1931 as part of the headquarters of the East Surrey Traction Company (the Company was taken over by the London Transport Passenger Board in 1933, with London General Country Service, later known as London Country Buses).
- 1.2 The building comprises a part of the former bus depot which was converted to offices and has a modern glazed façade, with external play area located to the western side of the building. There is parking to the south, east and west of the site. The building is located on the northern side of Lesbourne Road. The surrounding area is characterised by predominantly residential with some commercial and some open land to the north. There are no significant trees likely to be affected by the proposed development. The site level decreases towards the east. The site of the building abuts the Chart Lane Conservation Area to the north.

2.0 Added Value

- 2.1 Improvements secured at the pre-application stage: Formal pre-application advice was not sought from the Local Planning Authority prior to the submission of the application. Informal advice was given by the Conservation Officer in relation to a scheme proposing 14 dormer windows within the roof and 10 additional windows at the ground floor level. Feedback was provided verbally by the Conservation Officer, who expressed concerns with the proposal. The scheme was subsequently revised, taking these comments into account, prior to submission of the application.
- 2.2 Improvements secured during the course of the application: Following concerns raised with regard to the principle of inserting windows/ openings into the northern roof plane, amendments were offered by the applicants in order to address the concerns raised by the Council. The dormer windows as originally proposed were amended for 8 conservation style roof lights; however it is not felt that the amendments to replace the proposed dormer windows with rooflights would sufficiently overcome concerns raised with regard to the principle of windows/ openings in the northern roof plane and the impact of this on the listed building.
- 2.3 Further improvements could be secured: None as the application is to be recommended for refusal.

3.0 Relevant Planning and Enforcement History

The planning history for the property is extensive. The most recent applications are listed below:

97/09490/F Part demolition/ redevelopment and part refurbishment to provide new class B1 office building and restaurant (class A3) together with associated parking and landscaping – Approved with Conditions

97/09480/LBC Part demolition/ redevelopment and part refurbishment to provide new class B1 office building and restaurant (class A3) together with associated parking and landscaping – Approved with Conditions

99/01110/LBC Alterations to existing fenestration of retained part of listed building in connection of planning permission 97P/0948 and listed building consent 97P/0948 Approved with Conditions

00/02429/CU Change of use of retained part of listed building to class B1 (offices) – Approved with Conditions.

00/09620/CU Change of use of retained part of listed building to class D1 (Nursery) with formation of new vehicular egress, alterations to car parking layout to include external play area & associated external alterations (amended description) – Approved with Conditions

00/92350/LBC Alteration to the front elevation of new office building (revision to listed building consent 97P/0948) Drawing Nos. 4503 D(0)01,2,3,4,5 – Approved with Conditions

00/92360/F Alteration to the design of the front elevation of new office building (revision to planning permission 97P/0949) – Approved with Conditions

02/00230/LBC - Works associated with the alteration of the car park and entrance to the site, (03.04.2002) GRANTED

09/01970/F - Installation of hand rail to front of building, (23.02.2010) GRANTED

10/00562/F Installation of handrail to front of building - AC - Approved with Conditions

21/00468/F External alterations comprising 9no. dormer windows at second floor level. As amended on 12/08/20 – Pending Consideration.

4.0 Proposal and Design Approach

4.1 This is a full planning application and listed building consent application for external alterations comprising the insertion of 8 conservation rooflights at the second floor level of the building within the north elevation. Within the planning statement submitted in support of the application it is stated that the proposed windows are required in order to provide adequate levels of natural light and outlook to the second floor office space, which at present is not served by windows to the northern side, and that the absence of windows is hindering the potential occupation of the building. There would be two differing windows used, with some variation in the width and amount of glazing for the rooflights, in order to match the existing window widths at first floor below. The cill and head height of all the proposed windows would be level along the length of the building. They would be metal framed windows. The larger of the two window types would be 4.7m in width and 1.5m in height, whilst the smaller would be 3.6m in width and 1.5m in height.

4.2 A design and access statement should illustrate the process that has led to the development proposal, and justify the proposal in a structured way, by demonstrating the steps taken to appraise the context of the proposed development. It expects applicants to follow a four-stage design process comprising:

Assessment;
Involvement;
Evaluation; and
Design.

4.3 Evidence of the applicant's design approach is set out below:

Assessment	<p>The building is Grade II listed, and falls within the Chart Lane Conservation Area, as well as being adjacent to the Reigate Town Conservation Area. There are also a number of other statutorily listed and locally listed building nearby, and a Grade II statutorily listed park and garden. As such, a comprehensive Heritage Statement and Townscape/Landscape Visual Impact Assessment (“TVIA”) have been prepared. The Assessment notes that whilst the Site is linked to the renowned architects Wallis Gilbert and Partners, the historic parts of the building are not representative of their characteristic style and quality.</p> <p>The Assessment notes that whilst the Site is linked to the renowned architects Wallis Gilbert and Partners, the historic parts of the building are not representative of their characteristic style and quality. Furthermore, the only remnants of the original building include the small westernmost section (now occupied by a nursery school) and parts of the rear (north) elevation. The rear elevation has also been altered from what was constructed originally and the roof, which is affected by these proposals was completely rebuilt in 2000. Nonetheless, the Site is considered to have low to medium archaeological interest, medium historic interest, and low to medium architectural/artistic interest. The planning statement goes on to say that the value of the Site’s setting is considered to be medium, given that the building itself is Grade II listed, located in a Conservation Area (to which it makes a minimal and neutral to positive contribution), and within the settings of a number of other heritage assets. The Site makes a moderate and positive contribution to the setting of the adjacent Grade II listed former office buildings (Linden Court), and a neutral contribution to the settings of other nearby heritage assets. The Significance Statement therefore concludes that the overall heritage significance of the site is medium.</p>
Involvement	No community consultation is identified as having taken place.
Evaluation	Initial design proposals sought to insert 14 dormer windows within the roof plane and 10 additional windows to the ground floor of the north elevation of the building. Informal pre-application advice was sought from the Councils Conservation Officer on these proposals, to which concerns were raised. In response the number of dormer windows was reduced from 14 to 9 and the

	ground floor windows omitted. The widths of the proposed dormer windows were reduced to reflect existing windows below.
Design	The statement explains that the design of the proposals scheme has been informed by a detailed understanding of the history and heritage of the subject site and its wider setting, and the area's local distinctiveness. The proposals are considered to sensitively respect and conserve the historic environment by virtue of the design, reflecting the existing architectural style, idiom, detailing, proportions and materials of the subject site and the adjacent Grade II listed building.

4.4 Further details of the development are as follows:

Site area	0.65ha
Existing Use	Office (Class E)

5.0 Policy Context

5.1 Designation

Urban Area
Grade II Listed Building
Adjacent to Chart Lane Conservation Area

5.2 Reigate and Banstead Core Strategy

CS1(Sustainable Development)
CS4 (Valued townscapes and the historic environment)
CS10 (Sustainable Development),

5.3 Reigate & Banstead Development Management Plan 2019

Design	DES1
Natural and historic environment	NHE9
Transport, access and parking	TAP1

5.4 Other Material Considerations

National Planning Policy Framework
2021

National Planning Practice Guidance

Supplementary Planning Guidance

Surrey Design

Local Distinctiveness Design Guide

A Parking Strategy for Surrey
Parking Standards for Development

Other

Human Rights Act 1998
Community Infrastructure Levy
Regulations 2010

6.0 Assessment

6.1 The application seeks planning permission and listed building consent for external alterations comprising the insertion of 8 conservation rooflights at second floor level.

- Design and impact on the character of the Grade II listed building
- Impact on neighbouring amenity
- Transport matters

Design and impact on the character of the Grade II listed building

6.2 Paragraph 199 of the NPPF 2021 requires local planning authorities to consider the impact of a proposed development on the significance of a designated heritage asset, and great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 200 follows by stating that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks gardens, and World Heritage Sites, should be wholly exceptional.

6.3 Policy NHE9 of the Councils Development Management Plan 2019 (DMP) requires development which has the potential to impact on a designated heritage asset to preserve its character and setting. The policy states with regard to Grade II listed buildings that, in considering planning applications that directly or indirectly affect designated heritage assets, the Council will give great weight to the conservation of the asset, irrespective of the level of harm. Any proposal which would result in harm to or total loss of a designated heritage asset or its setting will not be supported unless a clear and convincing justification is provided. In this regard: Substantial harm to, or loss of, Grade II

assets will be treated as exceptional and substantial harm to, or loss of, Grade I and II* assets and scheduled monuments will be treated as wholly exceptional.

- 6.4 The Councils' Conservation Officer has reviewed the application and makes the following comments:

Further to our recent site visit my views are as follows, as previously noted the Bus Garage of 1931 is a barn like building with few windows and a handmade clay tile roofscape without dormers or rooflights. In converting the Garage in recent years, great efforts were made to ensure that new windows, rooflights or dormers were avoided on the north side. This building is quite different in character to the Bus Company Offices of 1932 situated on the west side of the site.

It is considered that the proposed dormers or rooflights would disrupt what is a clean and powerful unbroken roofscape. It is appreciated that at present there is a winter tree issue as the self-seeded trees in the land adjacent provide cover in the summer. As noted, in converting the Garage in recent years, great efforts were made to ensure that new windows, rooflights or dormers were avoided on the north side of the roof. A glazed building on the south side was accepted as a way of achieving this but it is apparent that this has been poorly designed in terms of the light penetration within the building on several floors. I consider as a less damaging alternative that rooflights provided on the hidden southern plane of the roof would not be visible from the street or from the ground as they would be hidden by the southern office block and provide additional light, and a reduction in the depth of the internal floor and increase in the size and width of the atrium would seem to be needed to provide light generally in the building. I am concerned that the problems were apparent on other floors and if the issue is not resolved by a redesign on the south side there would be pressure for further windows on the north side at other levels.

The NPPF notes, inter alia, the following for designated Heritage Assets assuming the harm is less than substantial;

Considering potential impacts

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed

against the public benefits of the proposal including, where appropriate, securing its optimum viable use

There is a need to minimise harm to the Heritage Asset, irrespective of the level of harm and any harm requires clear and convincing justification. Paragraph 199 of NPPF notes that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

There is clearly a problem with the southern glazed building which was intended to avoid alterations to the northern elevation of the listed building. My view is that its inadequacies should be addressed by remodelling the south building atrium as the deep floors as no longer fit for purpose. The listed building has already been considerably altered and it is important that its integrity is not further eroded. Whilst appreciating the problems of the modern southern building this should not be resolved by harming what is left of the northern principal elements of the listed building. I therefore consider that the proposal is harmful to the character and integrity of the listed building and strongly recommend refusal from a conservation viewpoint.

- 6.5 In support of the proposal, the applicants have argued that the scheme would bring about a number of key economic benefits that should be afforded significant weight in the consideration of this application. These benefits have been submitted in the form of a statement, which are attached separately to this report, however the key points raised are outlined in the following sections.
- 6.6 It is argued that the works would transform the quality of the space – future-proofing it to enable it to attract tenants over the long-term, as at present the offices located on the second floor of the building do not have window openings and therefore very poor access to natural daylight and external views. Occupation of the currently vacant 437 sqm GIA share of the space for use by a business would support policy objectives at the national, regional and local level which aim to help local businesses to thrive and grow. The improvements would also be expected to deliver the following local economic benefits:
- High-quality employment space brought into use, suitable for use by a local business or a new business to the borough;
 - Space to accommodate estimated 30-40 full-time equivalent jobs;
 - Uplift in Gross Value Added (GVA) of between approximately £3.9 million and £5.2 million per year;
 - Local spending by net additional workers within the local economy of between £85,000 to £110,000 per year; and
 - Additional Business Rates Revenue for Reigate and Banstead (no rates are payable while the space is vacant as the building is listed).
- 6.7 It is contended that despite the challenging market there have been a number of enquiries about the vacant second floor space over the last 12 months. However it has not been possible to let the space in its current state. All potential occupiers who have viewed the accommodation have stated that they

would be interested in taking up the space should windows be installed, however the current condition of the unit is not suitable to meet their needs for high quality space with good access to natural daylight and external views. It is argued that all of these potential occupiers would have represented an inward investment into Reigate if the space was suitable, as they are not currently represented in the town. The poor quality of the existing space has to date led to the loss of those investments to locations elsewhere outside of Reigate. It is further argued that, as a consequence of the pandemic, many people have expressed a desire to work from home at the very least on a part time basis, therefore there is a need to provide high quality office spaces to encourage employees back to offices. In support of this view a letter from DTRE estate agents has been submitted and is appended to this report.

- 6.8 As stated earlier in this report and referenced by the Conservation Officer, when considering the potential impact of development on the significance of a designated heritage asset, the NPPF requires any harm to, or loss of, the significance of a designated heritage asset to require clear and convincing justification. Whilst the economic arguments in support of the proposal have been afforded appropriate weight, it is not considered that this would outweigh the harm to the building. Paragraph 199 of the NPPF is clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. The north elevation of the building, with its' powerful, unbroken roofscape, represents the last remaining element of the original building, which has been significantly altered, particularly to the south in the form of a glazed atrium and modern entrance. Therefore the insertion of windows along the length of this elevation would result in the significant loss of significance of this building. This would be contrary to the requirement of the NPPF, which is clear that there is a need to minimise harm to the Heritage Asset, irrespective of the level of harm. Linden Court immediately to the west has a number of dormer windows within its roof space, however this building is of a quite different character and setting whereas the Omnibus Building was designed to resemble a barn like structure, which by its nature would be devoid of domestic clutter to the roof such as dormer windows or roof lights.
- 6.9 It was initially proposed that 9 flat roof dormer windows be inserted on the north elevation of the building. Concerns were raised to this by officers, and it was suggested that a more appropriate alternative would be the insertion of openings in the southern elevation of the building, where they would be less visible and able to allow light to penetrate the building, coupled with a reduction in the depth of the internal floor and increase in the size and width of the atrium would seem to be needed to provide light generally in the building. In response the applicants consider that this would not be a viable alternative, as this would not provide for outlook for future occupants of the office, which it is argued would be contrary to Core Strategy (Chapter 4), and the NPPF (Chapter 12) requires development to "*create places which promote health and wellbeing*". The applicants cite the Health, Wellbeing & Productivity in Offices Report' which states that the health and wellbeing of

employees is significantly enhanced by providing proximity to windows and access to views, noting that *“office occupants prefer access to windows and daylight, which bring consistent benefits in terms of satisfaction and health”*. *Longer distance views, away from computer screens or written documents, allow the eyes to adjust and re-focus, which reduces fatigue, headaches and the effects of eye strain in the long term. Views also have a positive impact on wellbeing, in part by providing a psychological connection with other groups of people while in a safe space, satisfying the instinctive human need for ‘refuge-prospect’*. It is also argued that provision of light and outlook increased productivity in the workplace and the obvious benefits of this to the economy more widely. The installation of rooflights on the southern plane, it is argued, would not only fail to provide economic benefits in terms of increased employee productivity but would also fail to assist in the prevention of a large area of office floorspace potentially becoming unlettable.

The installation of windows in the southern roof plane, it is suggested, would result in the building being subject to direct sunlight throughout the morning and much of the day, particularly during the summer months. The applicants have discounted this option, stating: *“The installation of rooflights on the southern plane of the roof is likely to provide some improvement to the internal light levels as existing. However, as this part of the roof is south-facing, rooflights in the suggested location would be subject to direct sunlight throughout the morning and much of the day, particularly during the summer months. This would not only result in unacceptable glare for an office environment but would also increase solar heat gain. The latter would be unacceptable in respect of environmental sustainability as additional cooling of the building would be required. In order to mitigate glare and solar gain, a shading strategy would need to be introduced such as the installation of blinds. Due to the high level of the rooflights, these would need to be electrically operated and externally located in order to be effective at reducing both glare and solar gain. Not only would this system be costly to install and maintain, but its addition of would likely create heritage implications in itself and would also reduce any daylight improvements made by the rooflights.”* As an alternative solution, the applicants offered amendments to the scheme, reducing the proposed openings from 9 dormer windows to 8 conservation rooflights.

- 6.9 It is clear that the glazed section to the south has been poorly designed with regard to allowing for light penetration to certain parts of the internal space. Whilst accepting that building needs improving in this regard, it is the view that this could be achieved without needing to further harm the last remaining elevation of the original building. It is officers view that alternative solutions to improving light provision and outlook to the building have not been sufficiently explored. As stated in paragraph 6.4, further internal alterations to the layout of the office space within, in addition to increasing the size and width of the atrium would be required to provide light more generally to the building, which is observed as being an issue across all floors, which when viewed on site appeared to suffer from similar light issues (ground, first and second), as well as improving outlook. This could reasonably be achieved as the existing deep office spaces are not fit for the purposes of modern office working.

- 6.10 In response the applicants contend that such alternations to the southern part of the building would be financially unviable to such an extent that it would put the listed building at risk. 'The rear of the building only has a depth of 8.5m from the atrium to the rear wall of the building. This is a shallow office compared with the vast majority of offices which have floorplates with much greater depths. The depth of the front of the building to the atrium is 16m and is not an impediment to occupation as daylight comes from both the atrium and from windows on the opposite wall. The windows at the front also importantly provide views. To increase the size of the atrium further could not be justified economically. The rebuilt tiled roof derives support from the columns at the edge of the existing atrium as does the glass roof over the atrium. The space at the rear of the building would then no longer be deep enough to be used as office space and it would effectively become a corridor. The costs would be substantial, more of the office accommodation would be lost than the gain in space by making the second floor rear lettable and therefore it could never be justified. Making the atrium larger would also not address the lack of external views.
- 6.10 Whilst there are clearly issues with both alterations to the atrium or the provision of rooflights on the southern plane, it is not clear that either option has problems that are insurmountable. The weight attributable to the economic benefits is thereby reduced accordingly such that, overall when conducting the planning balance, it is considered that the harm that would result to the distinctive, clean, unbroken expanse of roof which was purposefully designed as such to respect its context and setting, is not outweighed by the benefits. Therefore the proposal would be contrary to the NPPF 2021, Policy CS4 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and NHE9 of the Reigate and Banstead Development Management Plan 2019.

Impact on neighbouring amenity

- 6.11 The nearest residential property would be Linden Court to the east of the Omnibus building which, whilst now residential in use, once formed the offices for the former bus garage. This building features flat roof dormer windows around the roof of the building. Most of these would not be impacted by the proposed dormers due to the relationship between the two buildings, with the rear elevation of Linden Court angled away facing a north-easterly direction. This would render views between windows difficult and would give rise to minimal overlooking/ loss of privacy. It is noted that the roof plane of Linden Court features two windows in the southern elevation that face the Omnibus building; however there are no windows proposed to face this elevation. In view of this the proposal would not give rise to significant harm to neighbouring amenity and would comply with Development Management Plan Policy DES1 in this regard.

Highway Matters

- 6.12 Given that the application relates only to the insertion of windows to an existing office space there would be no highway implications to take in to account, therefore the application would be acceptable in this regard.

Reason for refusal

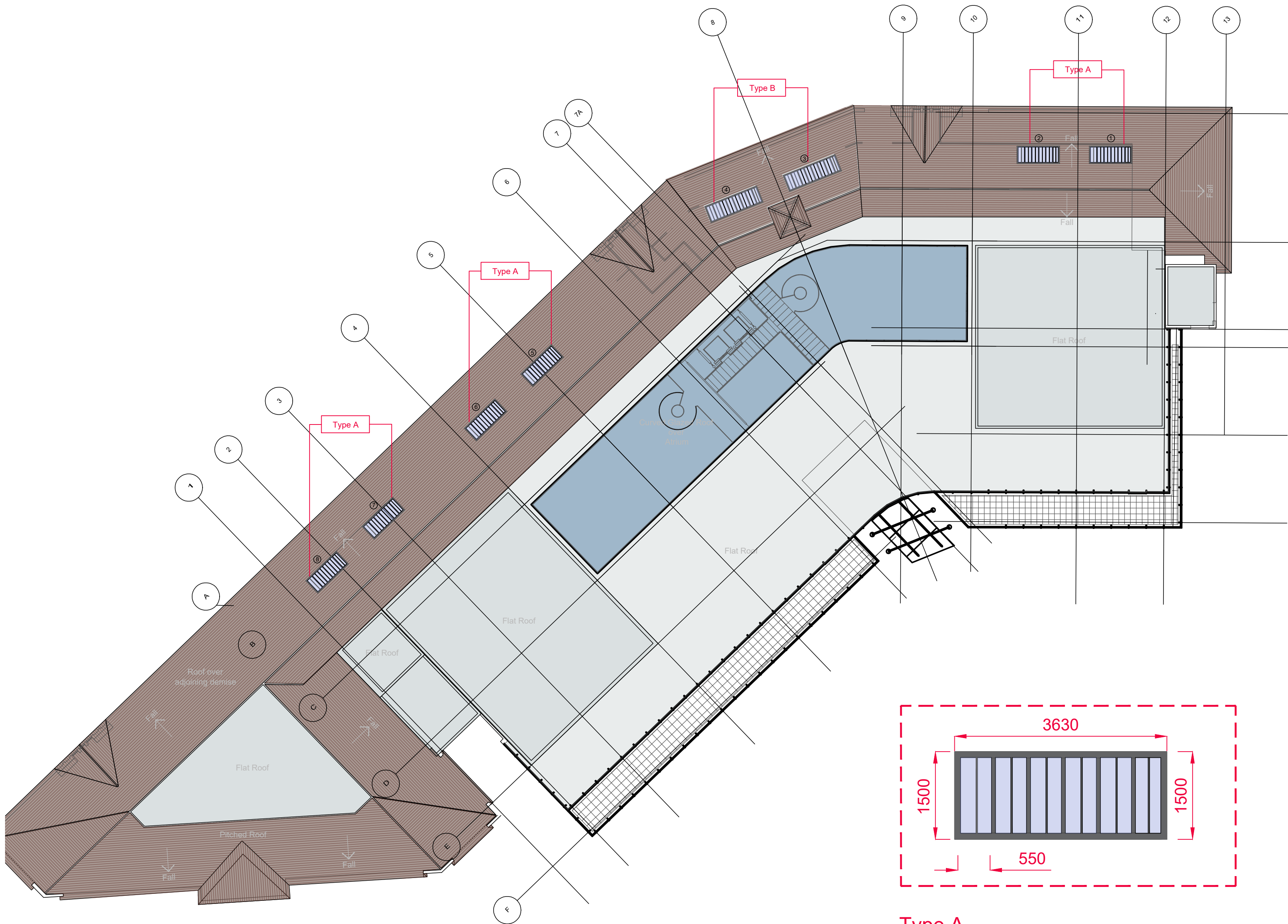
1. The proposed insertion of 8 conservation rooflights in the roof of the north elevation of the building would result in the cluttering of this large expanse of clean and unbroken roof which is a distinctive feature of the building and contributes positively to the setting of the Chart Lane Conservation Area. The proposal would therefore result in harm to the character and integrity of the Grade II listed building and the setting of the Conservation Area. The benefits of the proposal are not considered to outweigh this harm and the proposal is therefore contrary to the National Planning Policy Framework 2021, Policy CS4 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and NHE9 of the Reigate and Banstead Development Management Plan 2019

Proactive and Positive Statements

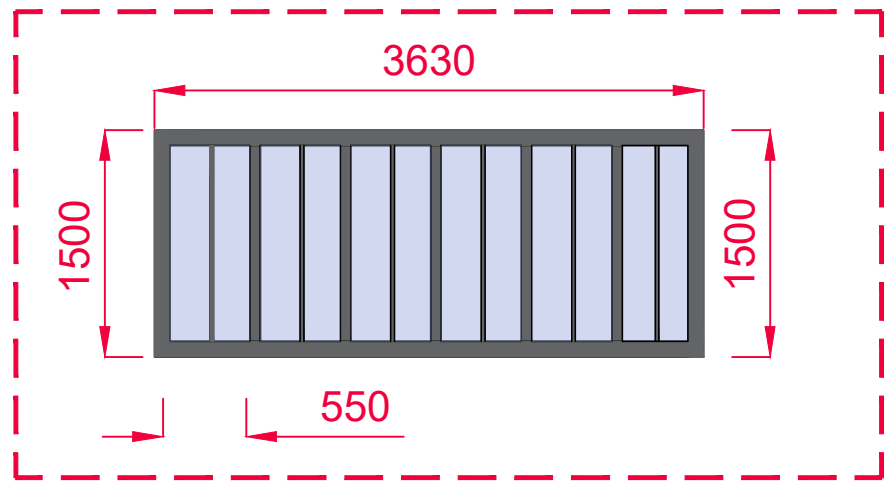
The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development where possible, as set out within the National Planning Policy Framework.

[illegible]

NOTES:

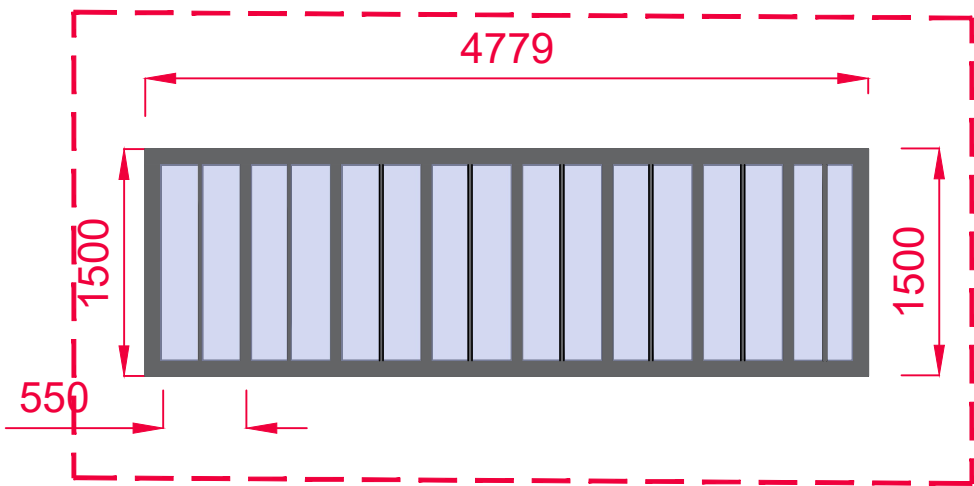


1 Proposed Plan
1:250



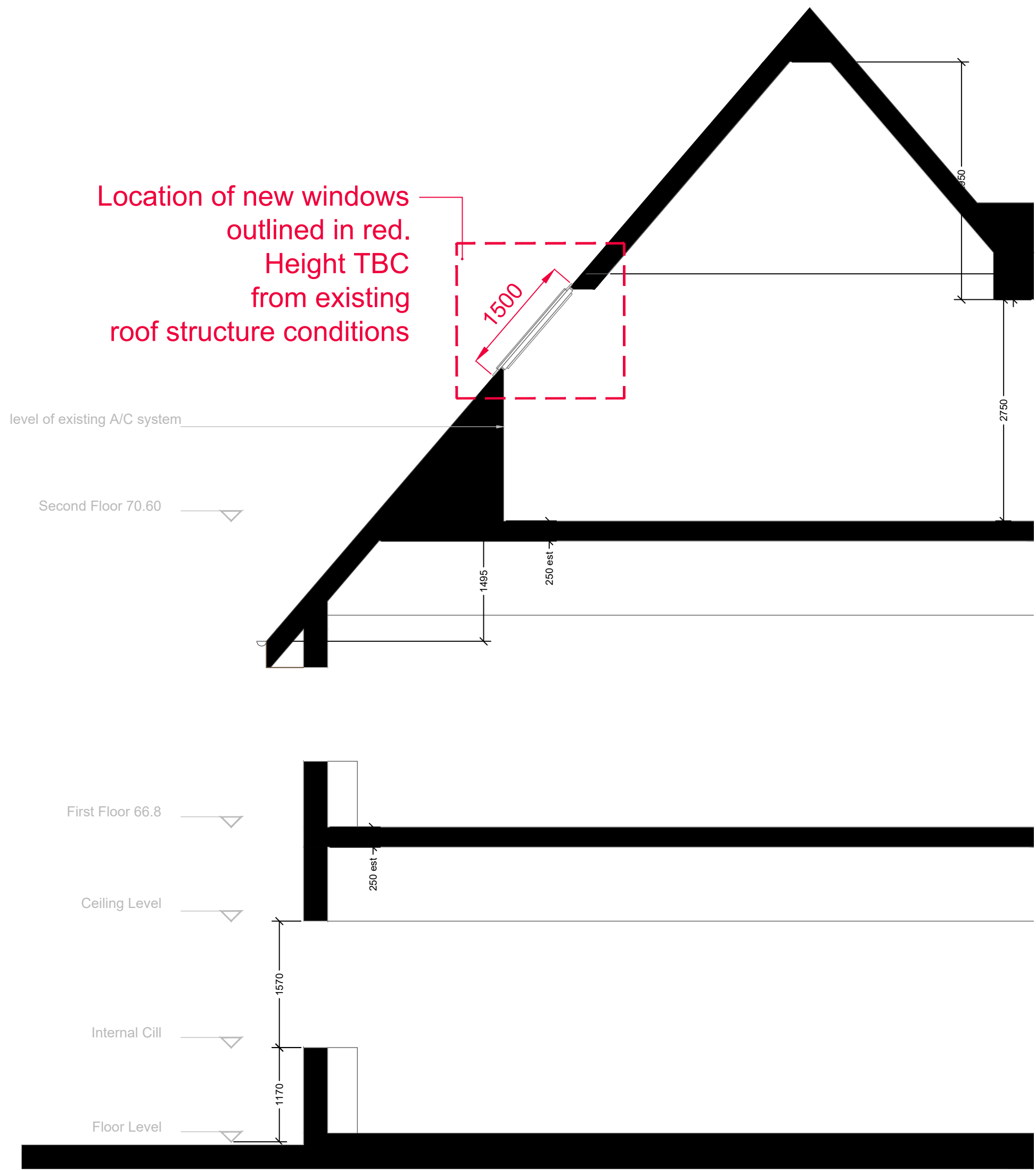
Type A

3 Detail 01
1:50



Type B

4 Detail 02
1:50



2 Section A-A - Proposed
1:50



5 Elevation - Proposed
1:200

P-01	05.05.21	SA	JD	Rooflight Windows Updated
Rev	Date	Drw	Chk	Notes

Planning

Client
Skelton Group

Project
The Omnibus Building
Lesbourne Road
Reigate RH2 7AU

Drawing Title
Listed Building Consent
Proposed Roof Lights

Drawn	Checked	Paper	Scale	Date
SA	JD	A1	1:	Apr 21
Project No.	Drawing No.	Revision		
20375	0306	P-01		

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Dear Daniel,

OMNIBUS – LESBOURNE ROAD, REIGATE, RH2 7JA

Omnibus, Reigate is a Grade A office building in a good location with good building fundamentals. However, a significant negative to the building is the lack of natural light to the rear of the building, and in particular, the 2nd floor. There is currently a tenant located on this floor, who have exercised their break, leaving the space vacant from 27th March 2021. This will leave over 27,000 sq ft of office space in the building capable of accommodating up to 250 employees empty in the current challenging economic climate.

We believe the addition of the windows to the rear of the building is vital to secure a future tenant. As a result of COVID-19 and the current economic uncertainty, we are seeing considerably less demand from occupiers and office take-up was down approximately 40% year on year in the south of England. We therefore need to be able to provide the best opportunity to let the building and the most flexibility. A key element for flexibility is to be able to split the floor, to accommodate for different size requirements. Without windows at the rear of the property, it makes the floor nearly impossible to split and will potentially leave it unlettable.

This is supported by the current interest we have in the property from two businesses. Both businesses want a split of the floor plate, to include the front section of the building where there is natural light. To secure these potential tenants the addition of windows to the rear of the building at 2nd floor level is required in order to undertake the proposed splits of the floor plate. Otherwise, it will leave sections of the property which are completely unlettable, as they will have no access to natural light. Not being able to provide these additional windows will therefore not only prevent the interested parties from occupying the office floorspace, but will also severely hinder future interest as the ability to offer flexible areas of floorspace will be limited. The long term vacancy of office floorspace is extremely detrimental to the local economy in terms of limiting employment generation and opportunities.

Additionally, a pattern we are currently seeing with occupiers is a 'flight to quality' with most employers recognising that having a good quality building environment is necessary to create a place where employees want to go to work, and therefore only relocating for betterment. It is becoming increasingly important for businesses to focus on employee wellbeing, not only for staff



retention and recruitment but also for mental health reasons. Therefore, factors such as natural light are a priority for all businesses.

There is now a measurement and guidance which Landlords follow, the 'WELL Standard Scores'. The WELL Building Institute is leading the global movement in improving the built environment to improve human health and well-being, through light, air, water, nourishment, fitness, comfort, and mind. A key part of this is the amount of daylight within an office building and standards that state most of the workforce should be located within close proximity to a window. Installing windows to the rear of the property will allow all workstations to be located close to natural light, making the floor plate much more diverse and efficient. Natural light into the building is a key selling point and without the building may run the risk of losing occupiers to buildings in surrounding towns, which do offer an abundance of natural light.

In addition to providing natural light, the proposed windows will provide access to views of green space and the countryside beyond.

Overall, this demonstrates the importance of additional windows for attracting future interest, from both a wellbeing and economic perspective. It is now widely recognised that employee wellbeing is a focus and becoming more important for most companies, and therefore demand for office space includes factors, such as natural light and access to views, which contribute to this.

Yours sincerely,



Hannah Davies
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Economic Benefits

Omnibus Building, Reigate

1 Introduction

- 1.1 The Omnibus building is an office building on the edge of Reigate town centre offering a total of approximately 7,698 sqm GIA office space arranged across three floors, with a large central communal atrium accessible to all tenants. The building is currently partly vacant and undergoing renovation works to improve the quality of the internal space for occupiers, including provision of the new atrium space and LED lighting improvements at a total cost of in excess of £1.25 million.
- 1.2 The proposed external alteration works to rear of the second floor of the building would dramatically improve approximately 777 sqm GIA office space that currently does not include window openings and has very poor access to natural daylight and no external views (as shown in Figure 1 below). Of this space, 437 sqm GIA is currently vacant.
- 1.3 The works would transform the quality of the space – future-proofing it to enable it to attract tenants over the long-term.
- 1.4 Occupation of the currently vacant 437 sqm GIA share of the space for use by a business would support policy objectives at the national, regional and local level which aim to help local businesses to thrive and grow. The improvements would also be expected to deliver the following local economic benefits:
 - 1.4.1 High-quality employment space brought into use, suitable for use by a local business or a new business to the borough;
 - 1.4.2 Space to accommodate estimated 30-40 full-time equivalent jobs;
 - 1.4.3 Uplift in Gross Value Added (GVA) of between approximately £3.9 million and £5.2 million per year;
 - 1.4.4 Local spending by net additional workers within the local economy of between £85,000 to £110,000 per year; and
 - 1.4.5 Additional Business Rates Revenue for Reigate and Banstead (no rates are payable while the space is vacant as the building is listed).

2 Policy Context

- 2.1 Planning policies at the national, regional and local level set out measures to support business to thrive and grow.



- 2.2 Helping to build a strong, competitive economy is one of the three overarching objectives of England's planning system set out in the National Planning Policy Framework (NPPF)¹. Paragraph 81 states: *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."*
- 2.3 In its Strategic Economic Plan² and Build Back Smarter, Greener and Stronger³ strategies the Coast to Capital LEP, sets out objectives to support the investment that will allow businesses to grow, including in the towns surrounding Gatwick airport.
- 2.4 Reigate and Banstead's Core Strategy⁴ sets out policies to support the local economy. Core Strategy Policy CS5 sets out the Council will support sustainable economic prosperity including by: *"Planning for a range of types and sizes of employment premises to cater for the needs of established, growing and start-up businesses; and ensuring sufficient flexibility to meet their changing needs and attract new businesses."* Supporting paragraph 5.5.14 states *"Ensuring best use is made of employment land is a key driver of 'smarter' working, as well as being the most sustainable approach to future development. Small businesses make a vital contribution to the borough's economy so it is particularly important to secure the conditions and facilities that allow these businesses to survive and grow."*

3 Supporting Businesses in Reigate and Banstead

- 3.1 Small businesses play an important part in the local economy. They support a significant amount of employment and offer great diversity in terms of skills profile and across various sectors. Supporting small businesses and enabling them to grow is key to developing a healthy and resilient local economy.
- 3.2 UK Business Counts data for 2020⁵ shows there are 8,210 local business units in Reigate and Banstead borough. Of these 87% are "micro" businesses with between 0-9 employees; 11% are small businesses with between 10-49 employees; and the remaining 2% have 50 or more employees.
- 3.3 The high proportion of small businesses in Reigate and Banstead indicates a large pool of potential demand for the kind of space offered by the Omnibus building.
- 3.4 Despite the challenging market there have been a number of enquiries about the vacant second floor space over the last 12 months. However it has not been possible to let the space in its current state. All potential occupiers who have viewed the accommodation have stated that they would be interested in taking up the space should windows be installed – the current condition of the unit is not suitable to meet their needs for high quality space with good access to natural daylight and external views.

¹ MHCLG, 2012 (updated July 2021), National Planning Policy Framework.

² Coast to Capital LEP, 2018. Strategic Economic Plan 2018-2030.

³ Coast to Capital LEP, 2020. Build Back Smarter, Greener and Stronger.

⁴ Reigate and Banstead Borough Council, 2014. Core Strategy.

⁵ Inter Departmental Business Register (IDBR), 2020. UK Business Counts data.



- 3.5 All of the potential occupiers would have represented an inward investment into Reigate if the space was suitable, as they are not currently represented in the town. The poor quality of the existing space has to date led to the loss of those investments to locations elsewhere outside of Reigate.
- 3.6 The need for office space to be of a higher amenity quality than would have previously been acceptable has been underlined by the growth in home and flexible working during the Covid 19 pandemic which is why these improvements are being sought now to future-proof the space. Many workers have reported a preference to continue working from home at least some of the time once restrictions on travel and social mixing are lifted. A YouGov survey September 2020 found 57% of workers would like to work from home at least some of the time after the pandemic (compared to 32% who did before)⁶.
- 3.7 The pandemic has therefore caused businesses to rethink their space requirements and this is likely to mean there will be a “flight to quality”, as many businesses seek out space suitable to encourage workers back to the office.
- 3.8 The internal upgrade works that have been made to the remainder of the Omnibus Building to date have supported attracting a new occupier⁷, despite challenging market conditions arising due to the pandemic. This success is testament to the quality of the space available within the rest of the building, and the benefits that it offers to businesses.

4 Economic Benefits

- 4.1 As well as supporting national, regional and local policies that seek to encourage businesses to grow, the letting of the currently vacant space at the Omnibus building would be expected to generate the following economic benefits locally:
 - 4.1.1 A number of jobs would be expected to be generated by the proposed improvement works. This could create an opportunity for a local contractor to tender for the works.
 - 4.1.2 Once the proposed improvements are complete, the currently vacant space would provide high quality office floorspace in a highly accessible town centre location – with excellent transport links, including via road (access to M25 and Gatwick Airport) and train (Reigate train station provides regular services including to London, Gatwick Airport, and Reading). Transport links provide sustainable commuting links for employees, as well as linking businesses to potential customers, clients and the wider supply chain. The building owners also run a shuttle bus service to Redhill train station to further increase the accessibility and sustainability of the location. This would make most efficient use of land and an existing building rather than building new space elsewhere.

⁶ YouGov, September 2020. Based on workers in work who were in work prior to the pandemic and expect to continue to be in work following the pandemic. Available online: <https://yougov.co.uk/topics/economy/articles-reports/2020/09/22/most-workers-want-work-home-after-covid-19> Last accessed August 2021.

⁷ Vacancy of this area of the building arose following departure of existing tenant Capita, leaving one third of the building vacant.



- 4.1.3 Based on standard floorspace to employment density guidelines⁸ the improved 437 sqm GIA space would be expected to accommodate between 30-40 full-time equivalent (FTE) jobs. (This is in line with the number of employees reported by businesses enquiring about the space, (c.35-50 employees headcount – likely to include a mix of full-time and part-time roles)).
 - 4.1.4 It is expected the workers within the improved space will contribute approximately £85,000 to £110,000 per year spending in the local economy during the working day⁹.
 - 4.1.5 The employment accommodated within the improved space would be expected to generate between £3.9 million and £5.2 million per year in GVA¹⁰, (economic value generated by the expected employment activity).
 - 4.1.6 The Proposed Development would be expected to generate Business Rates revenue of approximately £45,000 per year¹¹. The existing vacant space is exempt from Business Rates due to its status as a listed building.
- 4.2 In summary, the proposed improvement works would create a high-quality business space in Reigate suitable for use by a local business. This in turn would support new employment locally, and generate economic benefits – in a sustainable, accessible town-centre location, supporting efficient use of land.

⁸ Homes and Community Agency, 2015. Employment Density Guide. Jobs generated at Omnibus Reigate based on a range of between 10 sqm (NIA) per job for B1a Finance and Insurance uses, and 13 sqm (NIA) per job for B1a Corporate uses.

⁹ Visa Europe, 2014. Worker spending data. 2014 data showed workers spend on average £10.59 a day in the area local to their work, for 220 days a year. This has been adjusted to account for inflation (Bank of England averaged 2.3% a year) to generate expected spending in 2021 of £12.59 per day.

¹⁰ ONS, 2018. Regional GVA by industry: local authority level (Reigate and Banstead) 2018; and BRES, 2018.

¹¹ Based on comparable space within the existing building (Valuation Office Agency). The final amount payable will be determined by a valuation of the completed space.



Figure 1: Photos of the existing second floor space – indicating poor access to natural daylight or external view

