

20th October 2025

Project/File: 333102790/A5

SUBMITTED VIA PLANNING PORTAL REF: PP-14407729

Development Management
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

Dear Sir/Madam,

PEASE HOUSE, THE HITCHIN PRIORY, TILEHOUSE STREET, HITCHIN
CLASS MA, PART 3, SCHEDULE 2 OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)
PRIOR APPROVAL APPLICATION FOR CHANGE OF USE FROM COMMERCIAL, BUSINESS AND SERVICE (USE CLASS E) TO DWELLINGHOUSES (USE CLASS C3)

We hereby apply on behalf of our client, Metric + Maker Limited ("the Applicant"), to the Local Planning Authority ("LPA") at North Hertfordshire District Council ("NHDC") for Prior Approval for the proposed change of use from Use Class E (Commercial, Business and Service) to Class C3 (Dwellinghouses) at Pease House, The Hitchin Priory, Tilehouse Street, Hitchin, SG5 2DW ("the Application Site").

DESCRIPTION OF DEVELOPMENT

The application is submitted pursuant to Class MA of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the Order"). The proposed description of development is as follows:

Prior approval for change of use from Commercial, Business and Service (Use Class E) to 27 Dwellinghouses (Use Class C3) under Class MA of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Further details of the Application Site, proposed development and planning considerations relevant to Class MA of the Order are set out below.

SITE DESCRIPTION

The Application Site comprises of Pease House, which is an existing three storey office building located towards the southern edge of Hitchin town centre. The Application Site is located on Old Charlton Road and accessed via Tilehouse Street. Pease House forms part of a collection of three offices buildings, including Radcliffe House and Keynes House, plus several ancillary buildings. Pease House is located in the southern

section of the wider site and benefits from at grade car parking facilities. Mature woodland is situated to the south and east of the existing building.

The Application Site is situated within Hitchin Conservation Area. It is not a statutory or locally listed building but is located within the setting of several grade II listed buildings to the north and north east at 1 and 2 Tilehouse Street, the Coach House, the Garden Bridge, the Stables and the grade I listed building at The Priory.

The Application Site is in Flood Zone 1, the lowest risk of fluvial flooding, but is within a surface water flood risk zone (1 in 30, 1 in 100 and 1 in 1,000 events).

PLANNING HISTORY

The relevant planning history is as follows:

- Planning permission (ref: 83/00313/1) was granted on the 20th October 1983 for the redevelopment of the Application Site to provide the three office buildings and 140 car parking spaces.
- On the 25th September 1986, planning permission (ref: 86/00567/1) was granted for the erection of covered service yard in association with office development.

The existing building have been subject to other planning applications for minor external alterations, but these are not relevant to the Applicant's proposals.

On the 15th October 2024, a prior approval application (ref. 24/01669/PNMA) for the change of use from Commercial, Business and Service (Class E) use to residential (Class C3) use comprising 49 dwellings was granted at Radcliffe House, adjacent to the Application Site.

PROPOSED DEVELOPMENT

The proposed residential use comprises 27 apartments made up of the housing mix set out in **Table 1** below:

TABLE 1: PROPOSED HOUSING MIX	
Unit size	Number of homes
1 bedroom	13
2 bedrooms	14
Total	27

All new dwellings have been designed to meet the Government's Technical Housing Standards (2015). The submitted drawings and accompanying Design Statement demonstrate compliance with these standards.

A total of 48 car parking spaces, comprising 41 resident parking spaces and 7 visitor parking spaces, and 27 long stay resident cycle parking spaces and 27 short stay visitor cycle parking spaces would be provided as part of the development.

The car parking provision is located within two existing car parks; one located adjacent to Pease House and a second at car park a short distance to the east of the Hitchin Priory. Secure cycle parking for residents will be provided within building with visitor cycle parking provided in the repurposed existing cycle store located on the western side of Pease House. The existing refuse storage facilities will re-used to provide domestic refuse and recycling storage space for the new apartments.

LEGISLATIVE AND POLICY CONTEXT

Class MA of Part 3, Schedule 2 of the Order confirms that development is permitted subject to Class MA.1 and various conditions stipulated in Class MA.2. In addition to meeting the criteria set out under Class MA.1,

Class MA.2 states that an applicant must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to—

- (a) transport impacts of the development, particularly to ensure safe site access;
- (b) contamination risks in relation to the building;
- (c) flooding risks in relation to the building;
- (d) impacts of noise from commercial premises on the intended occupiers of the development;
- (e) where—
 - (i) the building is located in a conservation area, and
 - (ii) the development involves a change of use of the whole or part of the ground floor, the impact of that change of use on the character or sustainability of the conservation area;
- (f) the provision of adequate natural light in all habitable rooms of the dwellinghouses;
- (g) the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;
- (i) where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building.

An Article 4 Direction withdrawing the permitted development rights available under Class MA of the Order has been imposed by the Council in relation to land falling within Hitchin Town Centre. The Direction, however, only applies to specific properties in Hitchin Town Centre and does not include the Application Site.

The following development plan policies contained in the North Hertfordshire Local Plan 2011-2031 (November 2022) (“the Local Plan”) are relevant to the considerations subject to prior approval:

- Policy SP6: Sustainable transport
- Policy SP9: Design and sustainability
- Policy SP11: Natural resources and sustainability
- Policy T1: Assessment of transport matters
- Policy T2: Parking
- Policy D1: Sustainable design
- Policy D3: Protecting living conditions
- Policy NE7: Reducing flood risk
- Policy NE8: Sustainable drainage systems
- Policy HE1: Designated heritage assets

The National Planning Policy Framework (NPPF) (December 2024) and the Council’s Vehicle Parking at New Development Supplement Planning Document (SPD) (September 2011) are relevant material considerations in the assessment of the proposals.

A compliance check against the various conditions contained in Class MA of the Order are set out at **Appendix 1** and summarised in the planning considerations below.

PLANNING CONSIDERATIONS

In accordance with Class MA of Part 3, Schedule 2 of the Order, the above matters have been considered and where relevant appropriate mitigations measures have been put in place. The conclusions of the accompanying technical assessments accompanying the application are summarised below.

a. Transport

The Transport Statement prepared by i-Transport considers the impact of the proposed change of use on the local transport network as well as considering the accessibility of the site for all modes of transport. The Site

is fully developed, providing existing office space and car parking spaces, with two main accesses to the Site. A total of 48 car parking spaces will be provided in car parking courts located within the Application Site. The proposed car parking is comprised 41 residents parking spaces and 7 visitor parking spaces, which meets the minimum parking standards set out in the Council's Vehicle Parking at New Development SPD. The car parking is contained in two separate car parks that formed part of the existing office use and are conveniently located either immediately adjacent or a short distance away from Pease House. Visitors would also be able to use the numerous nearby public car parks and on-street parking, in addition to using public transport.

A total of 27 secure cycle parking will be provided for residents, plus 27 visitor cycle spaces provided externally via the repurposed office cycle storage facility in accordance with the Council's Vehicle Parking at New Development SPD. Refuse and recycling collection will be managed as per the existing arrangements by using the existing refuse stores located adjacent to Pease House.

The proposed change of use does not give rise to impact upon the surrounding highway network or existing parking provision and is located in a sustainable location. The number of trips associated with the Application Site and people using public transport is expected to reduce, thereby avoiding the need for enhancements to local infrastructure. The proposed parking provision also complies with the Council's minimum parking standards. The proposals comply with the transport principles set out in section 9 of the NPPF, policies T1 and T2 of the Local Plan and the Council's Vehicle Parking at New Development SPD and as such is acceptable from a highways and transportation perspective.

b. Contamination

A Phase 1 Environmental Site Assessment prepared by Conestoga-Rovers & Associates (Europe) Ltd (CRA), concludes that there are no major environmental concerns. The report is the same report that was considered as part of the previous Prior Approval Application (ref: 24/01669/PNMA) submitted and found acceptable, subject to conditions, for Radcliffe House. The scope of the assessment covers all three office buildings, namely Radcliffe House, Pease House and Keynes House, that form part of the wider Priory site. It is not expected that the condition of the Application Site has changed since the previous assessment was completed.

The proposals do not require any breaking of existing ground and involves internal alterations of the existing building only. No contamination risks in relation to the residential use of the building are expected.

c. Flood risk

A Flood Risk Assessment has been prepared by Water Environment Ltd, which details how the proposed change of use takes into account and mitigates flood risk. The site is located in Flood Zone 1, at low risk of flooding from rivers. The only identified potential source of flood risk to the Application Site is from surface water flooding. The assessment notes that there is a risk of surface water ingress from an existing fire exit door and recommends that these doors are replaced with suitably designed flood doors so to mitigate any potential flood risk.

The ground floor levels and above, proposed for conversion from offices to residential apartments, are elevated above any existing external flood depths in excess of the standard 300mm freeboard allowance. No external works are proposed to the building itself as part of the proposed change of use. The assessment concludes that Pease House can be converted to residential use without increasing the risk of flooding to new residents or third-party landowners.

d. Noise

A Noise Impact Assessment has been prepared by KP Acoustics Ltd. It considers the existing levels of noise and any impact on existing businesses and the future occupants of the proposed residential use. External environmental noise surveys have been undertaken allowing the assessment of daytime and night-time levels likely to be experienced by the proposed development.

No commercial noise sources were noted onsite or nearby and therefore there are no acoustic mitigation measures required to achieve compliance with Class MA of the Order. As good practice, all the existing windows will be replaced with new units fitted with a robust glazing specification that will meet the design criteria of BS8233:2014. The replacement windows will match the appearance of the existing. As a result, the replacement windows would not materially alter the appearance of the existing building and would not constitute “development” as defined by section 55 of the Town and Country Planning Act 1990 (as amended).

e. Conservation Area

Pease House is located in Hitchin Conservation Area, Area 7: Priory Park and Hitchin Hill. Accordingly, Stantec have prepared a Conservation Area Statement in support of the application. It concludes that the character of the Conservation Area is defined in relation to the importance of The Priory Hotel and its parkland setting, including grouping of trees, the River Hiz, the open spaces and none of these characteristics are harmed by the change of use of Pease House to residential use. The proposed change the use from office to residential use will not cause any harm to nearby listed buildings. The building is not considered to be within the curtilage or the setting of the listed Hitchin Priory Hotel nor any other nearby listed buildings.

It is considered that the proposed change of use will have no effect on the character or appearance of the Hitchin conservation area and more particularly Area 7: Priory Park and Hitchin Hill. Both the use and the internal changes will not affect the character of the location and its open parkland characteristic.

No harm would be caused to nearby heritage assets meaning that public benefits do not need to be demonstrated to outweigh any heritage related harm. The application therefore addresses the legislative requirements of a Prior Approval application, Chapter 16 of the NPPF and Historic England’s heritage guidance.

f. Daylight and sunlight

An Internal Daylight and Sunlight Report has been prepared by Point2 Surveyors. Climate Based Daylight Modelling (CBDM) and sunlight exposure calculations have been undertaken to the proposed habitable rooms in accordance with the 2022 Building Research Establishment (BRE) Report 'Site layout planning for daylight and sunlight - A guide to good practice' (“the BRE Guidelines”) and BS EN 17037.

The assessment demonstrates that all the proposed residential habitable rooms will meet the CBDM suggested daylight standards.

The sunlight assessments indicate that approximately 77% of the proposed habitable rooms will meet the recommended sunlight criteria. The sunlight assessments indicate that approximately 77% of the proposed habitable rooms will meet the recommended sunlight criteria, and all rooms with a window within 90 degrees of due south will be able to receive good levels of sunlight. As the percentage of 77% applies to all rooms, including those oriented within 90 degrees of due north, this is a very positive result and supports the view that the proposed development represents good site layout design.

Point2 Surveyors are of the professional opinion that the CBDM daylight results and sunlight assessments show all proposed habitable rooms will have access to adequate levels of daylight and sunlight amenity.

BIODIVERSITY NET GAIN EXEMPTION STATEMENT

In England, Biodiversity Net Gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act (2021)). However, development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of on-site habitat, and 5 metres of linear habitats such as hedgerows, is defined as being subject to the de minimis exemption¹.

¹ As set out in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

The proposed development involves the change of use of an existing building and associated land. No material operations impacting on existing on-site habitats are proposed. Accordingly, the proposals are subject to the de minimis exemption described above.

CONCLUSION

The provisions of Class MA of Part 3, Schedule 2 of the Order permit a change of use from Class E to Class C3 subject to the prior approval and determination by the LPA. The submission demonstrates that the proposals accord with the criteria set out under Class MA. Accordingly, the LPA should confirm whether prior approval is required and if the details hereby submitted are acceptable meaning that prior approval is granted.

The LPA has 56 days to provide its decision to this request. If the LPA do not issue a decision within these timescales, then the proposed change of use of existing building on the Site will receive deemed consent and therefore can take effect from 15th December 2025 in accordance with the submitted details.

ADMINISTRATIVE MATTERS

The drawings and documents listed in **Tables 2 and 3** below accompanying the submission for the LPA's consideration:

TABLE 2: SCHEDULE OF SUPPORTING DOCUMENTS	
Document title	Author
Covering letter (this document)	Stantec UK Limited
Prior approval application form	
Conservation Area Statement	
Design and Access Statement	Opstead Limited
Flood Risk Assessment	Water Environmental Ltd
Phase 1 Environmental Site Assessment	Conestoga-Rovers & Associates (Europe) Ltd
Noise Impact Assessment	KP Acoustics Ltd
Internal Daylight and Sunlight Report	Point2 Surveyors
Transport Statement	i-Transport

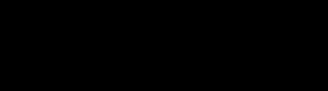
TABLE 3: DRAWING REGISTER		
Drawing Number	Drawing Title	Revision
133-OP-PL-SP-A-001	Site Location Plan	P0
133-OP-PL-SP-A-002	Existing Site Plan	P0
133-OP-PL-SP-A-003	Proposed Site Plan	P0
133-OP-PL-EP-A-001	Existing Ground Floor Plan	P0
133-OP-PL-EP-A-002	Existing First Floor Plan	P0
133-OP-PL-EP-A-003	Existing Second Floor Plan	P0
133-OP-PL-EP-A-004	Existing Third Floor and Roof Plan	P0
133-OP-PL-EP-A-005	Existing Roof Plan	P0
133-OP-PL-EE-A-001	Existing Elevations (Sheet 1 of 2)	P0
133-OP-PL-EE-A-002	Existing Elevations (Sheet 2 of 2)	P0
133-OP-PL-PP-A-001	Proposed Ground Floor Plan	P0
133-OP-PL-PP-A-002	Proposed First Floor Plan	P0
133-OP-PL-PP-A-003	Proposed Second Floor Plan	P0
133-OP-PL-PP-A-004	Proposed Third Floor and Roof Plan	P0
133-OP-PL-PP-A-005	Proposed Roof Plan	P0
133-OP-PL-PE-A-001	Proposed Elevations (Sheet 1 of 2)	P0
133-OP-PL-PE-A-002	Proposed Elevations (Sheet 2 of 2)	P0

In accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2023, as amended², an application fee of £6,750 has been calculated based on the proposed 27 dwellings. Including the Planning Portal service fee (£70.83 + VAT), the total fee payable is £6,835. Payment of the application has been made via bank transfer to Planning Portal.

We trust that the Council has all the required information to assess whether prior approval is required for this application and, if so, that it can be granted within 56 days of the registration of the application. We would be grateful if confirmation of receipt of this submission could be provided at the earliest opportunity.

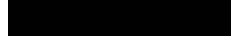
In the meantime, if you require any further information or wish to discuss matters further, please do not hesitate to get in contact.

Yours faithfully



Gary Stevens
Planning Director

Direct: +44 2074466859



gary.stevens@stantec.com

STANTEC UK LIMITED

² Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment and Transitional Provision) Regulations 2025.

APPENDIX 1

CLASS MA OF PART 3, SCHEDULE 2 OF THE TOWN AND COUNTRY PLANNING GENERAL PERMITTED DEVELOPMENT ORDER (ENGLAND) 2015: COMPLIANCE CHECKLIST		
MA. Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E (Commercial, Business and Service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (Dwellinghouses) of Schedule 1 to that Order.		
Para.	GPDO Criteria	Compliance Check
MA.1.— (1) Development is not permitted by Class MA —³		
b)	unless the use of the building fell within one or more of the classes specified in sub-paragraph (2) for a continuous period of at least 2 years prior to the date of the application for prior approval;	The building has been in a continuous office (Use Class E) use since being built in the mid-1980s, thereby complying with this requirement.
d)	if land covered by, or within the curtilage of, the building— (i) is or forms part of a site of special scientific interest; (ii) is or forms part of a listed building or land within its curtilage; (iii) is or forms part of a scheduled monument or land within its curtilage; (iv) is or forms part of a safety hazard area; or (v) is or forms part of a military explosives storage area;	The building is not covered by, or within the curtilage of, any of these site designations, thereby complying with this criterion.
e)	if the building is within— (i) an area of outstanding natural beauty; (ii) an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981; (iii) the Broads; (iv) a National Park; or (v) a World Heritage Site;	The building is not within any of these planning designations, thereby complying with this criterion.
f)	if the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained; or	The building is not occupied under an agricultural tenancy, thereby complying with this criterion.
g)	before 1 August 2022, if— (i) the proposed development is of a description falling within Class O of this Part as that Class had effect immediately before 1 st August 2021; and (ii) the development would not have been permitted under Class O immediately before 1 st August 2021 by virtue of the operation	This application would be determined after 1 st August 2021. Therefore, this criterion is not applicable.

³ Note paragraphs (a) and (c) have been omitted by The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2024.

	of a direction under article 4(1) of this Order which has not since been cancelled in accordance with the provisions of Schedule 3.	
2a) b)	The classes mentioned in sub-paragraph (1)(b) are the following classes of the Use Classes Order— (a) the following classes of the Schedule as it had effect before 1st September 2020— (i) Class A1 (shops); (ii) Class A2 (financial and professional services); (iii) Class A3 (food and drink); (iv) Class B1 (business); (v) Class D1(a) (non-residential institutions – medical or health services); (vi) Class D1(b) (non-residential institutions – crèche, day nursery or day centre); (vii) Class D2(e) (assembly and leisure – indoor and outdoor sports), other than use as an indoor swimming pool or skating rink; on or after 1st September 2020, Class E (commercial, business and service) of Schedule 2.	The existing building would have originally benefited from a Class B1 use that has since been updated to a Class E use following the amendments to the Town and Country Planning (Use Classes) Order 1987 in September 2020. The Applicant is not aware of any planning conditions which were imposed on the original planning permission to construct the buildings restricting the use of the buildings to offices only, and the granting of the previous prior approval application at Radcliffe House would suggest this is unlikely.
MA.2.— (1) Development under Class MA is permitted subject to the following conditions. (2) Before beginning development under Class MA, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to—		
a)	transport impacts of the development, particularly to ensure safe site access;	A Transport Statement considering the impacts on access arrangements, parking provision, waste collection, pedestrian movements and trip rates has been prepared and demonstrates that these issues can be addressed safely and in accordance with relevant parking and transport related planning policies. The proposed car and cycle parking provision meets the minimum standards set out in the Council's Vehicle Parking at New Development SPD. It is also expected that there will be a net reduction in the number of trips associated with the use of the Application Site, thereby reducing pressure on local public transport.
b)	contamination risks in relation to the building;	Phase 1 Environmental Site Assessment has been prepared that demonstrates that the buildings are not subject to contamination risks.
c)	flooding risks in relation to the building;	The Application Site is within Flood Zone 1 and so at a low risk of fluvial flooding. A Flood Risk Assessment has been prepared to address any surface water flood risk associated with the Application Site. Recommendations to provide suitably designed flood doors in place of the existing fire exit doorway is proposed to ensure any surface water ingress risk is mitigated.

d)	impacts of noise from commercial premises on the intended occupiers of the development;	A Noise Impact Assessment has been prepared and assesses the expected noise impacts on occupiers. No commercial premises are located nearby and acceptable noise conditions for future occupiers are expected.
e)	where— (i) the building is located in a conservation area, and (ii) the development involves a change of use of the whole or part of the ground floor, the impact of that change of use on the character or sustainability of the conservation area;	A Conservation Area Statement has been prepared and concludes that the internal alterations to the existing building would have no effect on the character or sustainability of the Hitchin Conservation Area.
f)	the provision of adequate natural light in all habitable rooms of the dwellinghouses;	An Internal Daylight and Sunlight Report has been prepared to demonstrate adequate natural light is received by all the habitable rooms of the new homes.
g)	the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;	None of these uses are within close proximity to the building.
h)	where the development involves the loss of services provided by— (i) a registered nursery, or (ii) a health centre maintained under section 2 or 3 of the National Health Service Act 2006, the impact on the local provision of the type of services lost.	N/A
i)	where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building.	The development would not meet the building height conditions resulting in the need for fire safety risks to be considered as part of the application – see relevant criteria at the end of this table.
3)	An application for prior approval for development under Class MA may not be made before 1 August 2021.	N/A
4)	The provisions of paragraph W (prior approval) of this Part apply in relation to an application under this paragraph as if (a) for paragraph (e) of sub-paragraph (2) there were substituted— “(e) where— (i) sub-paragraph (6) requires the Environment Agency to be consulted, a site-specific flood risk assessment; (ii) sub-paragraph (6A) requires the Health and Safety Executive to be consulted, a statement about the fire safety design principles, concepts and standards that have been applied to the development,”; [see interpretation of Class MA below] (b) in the introductory words in sub-paragraph (5), for “and highways impacts of the development” there were substituted “impacts of the development, particularly to ensure safe site access”;	Noted.

	(c) after sub-paragraph (6) there were inserted— “(6A) Where the application relates to prior approval as to fire safety impacts, on receipt of the application, the local planning authority must consult the Health and Safety Executive.”; [see interpretation of Class MA below] (d) in sub-paragraph (7) for “(5) and (6)” there were substituted “(5), (6) and (6A)”;	
5)	Development must be completed within a period of 3 years starting with the prior approval date.	Noted.
6)	Any building permitted to be used as a dwellinghouse by virtue of Class MA is to remain in use as a dwellinghouse within the meaning of Class C3 of Schedule 1 to the Use Classes Order and for no other purpose, except to the extent that the other purpose is ancillary to the use as a dwellinghouse.	Noted.
Interpretation of Class MA MA.3 Development meets the fire risk condition referred to in paragraph MA.2(2)(i) if the development relates to a building which will— (a) contain two or more dwellinghouses; and (b) satisfy the height condition in paragraph (3), read with paragraph (7), of article 9A (fire statements) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.		
Town and Country Planning (Development Management Procedure) (England) Order 2015 Fire Statements 9A – (3) The height condition is that— (a) the building is 18 metres or more in height; or (b) the building contains 7 or more storeys. (7) For the purpose of paragraph (3)— (a) the height of a building is to be measured from ground level to the top floor surface of the top storey of the building (ignoring any storey which is a roof-top machinery or plant area or consists exclusively of machinery or plant rooms); (b) when determining the number of storeys a building has— (i) any storey which is below ground level is to be ignored; and (ii) any mezzanine floor is a storey if its internal floor area is at least 50% of the internal floor area of the largest storey in the building which is not below ground level.		