

APPLICATION FOR PRIOR NOTIFICATION – PART 3 CLASS Q CASE OFFICER REPORT

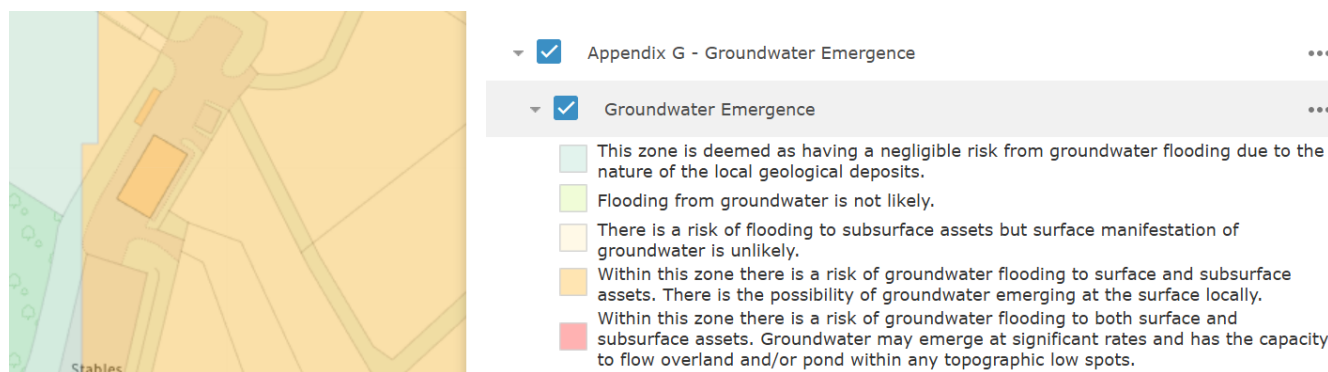
APPLICATION REFERENCE:	PL/2025/08586
APPLICATION TYPE:	Prior approval Part 3 Class Q: Agricultural buildings to dwellinghouses
SITE ADDRESS:	BARN AT LIFELY FARM, WEST ASHTON, TROWBRIDGE, WILTSHIRE, BA14 6AU
DEVELOPMENT DESCRIPTION:	Conversion of existing barn to two dwellings. The access track presently exists in serviceable order.
RECOMMENDATION:	That Prior Approval is required and GRANTED

SITE DESCRIPTION/CONTEXT: The application site is located in open countryside, outside any defined limits of development and is served by an existing established vehicular access from the A350 Yarnbrook Road. The application site is located to the southwest of West Ashton, which is a settlement identified in CP29 as a 'Small Village', which is included in the list of settlements which have had their boundaries removed in Appendix F of the adopted Wiltshire Core Strategy.

Following a review of the planning history on the site, the subject building was approved under application reference W/01/01478/FUL, where planning permission was granted for the erection of an agricultural building for livestock shelter and storage.

The application site is located in the 'yellow zone' of the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS), which represents areas at medium risk for habitat loss. The site is also located in various buffer zones associated with the Bat and Bradford on Avon Bat Special Area of Conservation (SAC) and within the Salisbury Plain Special Area of Protection (SPA) 6.4km buffer.

The application site is shown to be at risk of groundwater flooding with reference to the Council's Strategic Flood Risk Assessment mapping tool, as shown by the extract provided below. The area washed over with orange depicts the area at risk of high groundwater flooding.



The site is, however, not shown to be at risk for fluvial or surface water flooding, according to the Environment Agency's Flood Map for Planning.

PROPOSAL: This prior approval application is seeking to convert the existing barn into two, 3-bed dwellings, each with on-site car parking spaces, a rear garden, shared recycling storage and an EV charging point.

RELEVANT LEGISLATION, POLICY AND GUIDANCE: This application is assessed under Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), which grants planning permission for certain types of development described in Schedule 2 of the Order. The grant of permission is subject to the limitations, conditions, and provisions set out within the relevant Classes of permitted development.

Under Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), certain changes of use and associated operations may be permitted subject to prior approval from the Local Planning Authority.

Conservation of Habitats and Species Regulations 2017 (as amended)

RELEVANT PLANNING HISTORY

W/01/01478/FUL - Erection of agricultural building for livestock shelter and storage - Approved with conditions

W/05/01121/FUL - Change of use of land and buildings to mixed use of agriculture and equestrian (livery and breeding), together with provision of a menage – Withdrawn

W/07/01375/FUL - Change of use from agriculture to mixed use of agriculture and livery/breeding of horses including the provision of a menage, the established barn and three mobile field shelters storage - Approved with conditions

CONSULTATIONS

Wiltshire Council Highways Officer: No objection

Wiltshire Council Public Protection Officer: No objection

Wiltshire Council Ecology Department: Confirmed that a Regulation 77 application would be required.

The following informative could be applied to any decision on this PNCOU application.

There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species 2017 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Bat line online.

REPRESENTATIONS

Third-party Representations: One representation was submitted raising the following:

"West Ashton is a busy village with Bratton Road regularly used as a rat run for those avoiding the A350. The population levels from the A350 have been measured and equate to the levels experienced in city centres. As a resident on the edge of the village who has been witness to the increasing traffic levels on the A350 over the last 10 years, exacerbated by issues affecting the A36 and Bath, and local developments including the Travellers site, I have grave concern that this new application will open the flood gates to an additional application being granted on the adjacent site. The lack of infrastructure to support the changes and the ever-increasing pollution levels from the A350 must be managed before the Council allows this application to be passed".

ASSESSMENT: This application seeks prior approval under Class Q, which sets out the provisions, limitations and conditions for the permitted development right to change the use of "*buildings on agricultural units and former agricultural buildings to dwellinghouses*" as follows:

Q. Development consisting of—

(a) a change of use of—

- (i) a building that is part of an established agricultural unit and any land within that building's curtilage, or*
- (ii) a former agricultural building that was (but is no longer) part of an established agricultural unit and any land within that building's curtilage,*

to a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order,

(b) development referred to in sub-paragraph (a) together with the extension of the building referred to in sub-paragraph (a), or

(c) development referred to in sub-paragraph (a) together with building operations reasonably necessary to convert the building referred to in sub-paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule or to extend that building.

For the purposes of the Permitted Development (PD) right, the building's curtilage is defined by para. Q.3 as being:

(a) the piece of land, whether enclosed or unenclosed, immediately beside or around the agricultural building, closely associated with and serving the purposes of the agricultural building, or

(b) an area of land immediately beside or around the agricultural building no larger than the land area occupied by the agricultural building,

whichever is the lesser;

Does the Proposal Qualify as Permitted Development?: Development under Class Q is subject to a number of conditions and limitations. Development is not permitted by this class if any of the specified restrictions apply. These are set out at Appendix 1. Subject to compliance with these criteria and any limitations or conditions specified within the Order, the proposed development may be considered permitted development.

Having completed the detailed checklist provided in Appendix 1, it is concluded that the proposed development qualifies as permitted development under Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), and the assessment may now proceed to consider whether prior approval is required by the LPA.

Necessary Building Operations: In addition to the limitations set out in Paragraph Q.1 of the GPDO, case law has established that certain proposals may exceed the scope of a "change of use" and instead constitute the construction of a new dwelling. In such instances, the development would fall outside the permitted development rights granted under Class Q.

Therefore, it is necessary to assess whether the proposed works amount to a genuine "conversion" of the existing agricultural building, or whether they effectively result in a "replacement building." The Planning Practice Guidance (PPG) provides helpful clarification on this point, emphasising that the structural integrity and extent of building operations must be considered when determining whether a proposal qualifies as a conversion under Class Q. More specifically the PPG1 provides the following guidance in this regard:

"The right allows either the change of use (a), or the change of use together with reasonably necessary building operations (b). Building works are allowed under the right permitting agricultural buildings to change to residential use..."

¹ Planning Practice Guidance - Paragraph: 105 Reference ID: 13-105-20180615 (revision date 15/06/2018) - [When is permission required? - GOV.UK](#)

However, the right assumes that the agricultural building is capable of functioning as a dwelling. The right permits building operations which are reasonably necessary to convert the building, which may include those which would affect the external appearance of the building and would otherwise require planning permission. This includes the installation or replacement of windows, doors, roofs, exterior walls, water, drainage, electricity, gas or other services to the extent reasonably necessary for the building to function as a dwelling house; and partial demolition to the extent reasonably necessary to carry out these building operations. It is not the intention of the permitted development right to allow rebuilding work which would go beyond what is reasonably necessary for the conversion of the building to residential use. Therefore, it is only where the existing building is already suitable for conversion to residential use that the building would be considered to have the permitted development right.

For a discussion of the difference between conversions and rebuilding, see for instance the case of [Hibbitt and another v Secretary of State for Communities and Local Government \(1\) and Rushcliffe Borough Council \(2\) \[2016\] EWHC 2853 \(Admin\)](#).

Internal works are not generally development. For the building to function as a dwelling it may be appropriate to undertake internal structural works, including to allow for a floor, the insertion of a mezzanine or upper floors within the overall residential floor space permitted, or internal walls, which are not prohibited by Class Q.”

This prior approval application has been accompanied by a structural report (produced by Andrew Duignan Consulting Engineers, dated September 2025), which concludes that the visual inspection that was carried out confirms that “the structure is in very good condition and structurally stable with no major structural issues. The current building can be converted to a residential property without any changes to the existing height or plan area to comply with current Building Regulations” and continues stating that their company has “dealt with scores of barn conversions under Class Q and do not see this building as being anything other than eminently convertible within the intention of the regulations”.

The structural report concludes that the barn is eminently suitable for residential conversion, with only limited and conventional works required to convert the existing barn into two dwellings. It noted that the report does include recommendations such as replacing the roof, installing insulation, and timber cladding the exterior.

However, in light of the above PPG advice, the proposed works are considered to fall within the scope of those permitted under Class Q of the GPDO. The development comprises alterations that are consistent with the conversion of the existing agricultural building to residential use, including the installation of new windows and doors, replacement cladding and roof coverings, and internal works such as flooring. These works are to be carried out within the existing structural frame, which is to be retained without modification.

No structural alterations are proposed or appear necessary to facilitate the conversion, and the works are therefore regarded as internal or superficial in nature, not requiring separate planning permission. Therefore, the proposal does not exceed the limitations set out in paragraph Q.1 and is considered to constitute permitted development.

Is Prior Approval Required?: Where a proposal complies with all the provisions limitations set out under Class Q of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), the developer must apply to the Local Planning Authority (LPA) for a determination as to whether prior approval is required for the specified impacts and, if so, whether it should be granted.

In respect of this proposal, the following considerations must be assessed as part of the prior approval process as set out by Q.2.

Where the development proposed is development under Class Q(a) together with development under Class Q(c), development is permitted subject to the condition that before beginning the development,

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 and highways impacts of the development,*
- (b) noise impacts of the development,*
- (c) contamination risks on the site,*
- (d) flooding risks on the site,*
- (e) whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from agricultural use to a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order,*
- (f) the design or external appearance of the building, and*
- (g) the provision of adequate natural light in all habitable rooms of the dwellinghouses,*

and the provisions of paragraph W (prior approval) of this Part apply in relation to that application.

Paragraph W sets out a number of requirements for both the developer (in terms of the application submission) and the LPA (relating to consultations and advertisement of the application). Paragraph W(10) states that:

The local planning authority must, when determining an application—

- (a) take into account any representations made to them as a result of any consultation under sub-paragraphs (5) or (6) and any notice given under sub-paragraph (8);*
- (b) have regard to the National Planning Policy Framework issued by the Ministry of Housing, Communities and Local Government in February 2019 July 2021, so far as relevant to the subject matter of the prior approval, as if the application were a planning application; and*
- (c) in relation to the contamination risks on the site—*
 - (i) determine whether, as a result of the proposed change of use, taking into account any proposed mitigation, the site will be contaminated land as described in Part 2A of the Environmental Protection Act 1990, and in doing so have regard to the Contaminated Land Statutory Guidance issued by the Secretary of State for the Environment, Food and Rural Affairs in April 2012, and*
 - (ii) if they determine that the site will be contaminated land, refuse to give prior approval*

Para. W(13) allows LPAs to grant prior approval unconditionally or subject to conditions reasonably related to the subject matter of the prior approval.

Transport and Highways Impacts of the Development: Paragraph 115 of the National Planning Policy Framework (NPPF) emphasises the importance of promoting sustainable transport modes, ensuring safe and suitable access for all users, and designing development in accordance with national guidance. It also requires that any significant impacts on the transport network, whether in terms of capacity, congestion, or highway safety, can be mitigated cost-effectively.

Paragraph 116 of the NPPF further clarifies that development should only be refused on highway grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network, following mitigation, would be severe.

In terms of locational sustainability, the Local Planning Authority (LPA) is not able to assess whether the site's location in open countryside is sustainable in relation to access to services, employment, or facilities. This is not a consideration under the relevant prior approval provisions. Accordingly, the key matter for assessment is the impact of the proposal on highway safety, particularly in relation to the site access and the surrounding local highway network.

The proposed dwellings would be accessed via the existing vehicular access from the A350 and no changes to this are proposed. The proposed site layout plan confirms that there would be sufficient on-site car parking provision and turning space provided on-site.

The Council's highways department have commented that the access to the site *"is via a private track, which joins the public highway from the A350. The A350 is subject to a 40mph speed limit in this vicinity and experiences high volumes of traffic. It is unlikely that a significant intensification of use of this access track would be supported."*

Notwithstanding this, the proposals for two dwellings would not be expected to generate a significant amount of additional traffic movements when compared to the potential of the extant use. Furthermore, the track is sufficiently wide enough over the first 10m from the highway to enable vehicles to pass. Within the site, sufficient car parking can be provided for each unit."

On this basis no highways-based objection is raised and prior approval in relation to traffic matters is not required.

Noise Impacts: Paragraph 187(e) of the NPPF requires that planning decisions contribute to and enhance the natural and local environment by ensuring that new and existing development does not contribute to, or is not exposed to, unacceptable levels of noise pollution. This includes preventing development from being put at risk or adversely affected by such impacts.

Further to this, Paragraph 198(a) advises that new development should be appropriate for its location, taking into account the likely effects, including cumulative impacts, of pollution on health, living conditions, and the natural environment. It emphasises the need to mitigate potential adverse impacts arising from noise and to avoid noise that could result in significant harm to health or quality of life.

In the context of this proposal, the key consideration is whether the development would result in, or be exposed to, unacceptable levels of noise, and whether any such impacts can be appropriately mitigated to ensure a suitable living environment.

The existing barn is positioned in open countryside, but c.80m south of existing established residential use associated with West Ashton. As such, there are no concerns with regard to noise impacts from adjacent land to or from the proposed development.

The Council's Public Protection team have also not raised any objections to this proposal. Therefore, prior approval in relation to noise matters is not required.

Contamination Risks: Paragraph 196 of the NPPF sets out the expectations for planning decisions in relation to land quality and safety. It states that:

- a) Sites must be suitable for their proposed use, taking into account ground conditions and any risks arising from land instability or contamination. This includes risks from natural hazards or former activities such as mining, and any proposed mitigation measures, including land remediation and its potential environmental impacts.
- b) Following any necessary remediation, land should not be capable of being determined as contaminated under Part IIA of the Environmental Protection Act 1990.
- c) Adequate site investigation information, prepared by a competent person, must be available to inform the assessment of these risks.

In the context of this proposal, the LPA must be satisfied that the site is not subject to contamination or instability that would render it unsuitable for the proposed use, and that any necessary investigations or mitigation measures have been appropriately considered.

The Council is not aware of any substantive contamination risks arising from the subject site or building in question, and there is no indication of any contamination risks. The Council's Public Protection department was consulted on this application and raised no concerns/objections.

As such, it is considered that the development is acceptable with regard to contamination risks and prior approval in relation to contamination matters is not required.

Flooding Risks: The NPPF makes clear that inappropriate development in areas at risk of flooding should be avoided by steering development towards areas with the lowest risk, whether that risk is current or future. Where development is necessary in areas at risk, it must be demonstrated that the development can be made safe for its lifetime without increasing flood risk elsewhere.

Whilst the application site is identified on the Environment Agency's Flood Map for Planning as lying within Flood Zone 1, indicating a low probability of flooding from rivers and the sea, the Council's SFRA mapping tool has identified the site to be susceptible to groundwater flooding. It is important to mention that flood risk from all sources must be appraised, not solely fluvial.

In this case, the proposal seeks to convert an existing building and that the existing building would not be extended as part of this proposal. However, it is important that proposals are supported by appropriate flood risk assessment and mitigation to ensure the safety of future occupants.

On this basis, it is considered necessary for additional information to be submitted via a condition, to ensure groundwater flood risk can be managed effectively through mitigation to be addressed through the submission of a drainage strategy.

Location (Impractical or Undesirable): The PPG advises that LPAs should apply a reasonable approach to the assessment of the location being "impractical or undesirable"². It goes on to advise that:

When considering whether it is appropriate for the change of use to take place in a particular location, a local planning authority should start from the premise that the permitted development right grants planning permission, subject to the prior approval requirements. That an agricultural building is in a location where the local planning authority would not normally grant planning permission for a new dwelling is not a sufficient reason for refusing prior approval.

Applications should only be refused if there may be circumstances where adverse impacts cannot be mitigated. Examples given by the PPG, when looking at location, include an agricultural building on the top of a hill with no road access, power source or other services being impractical and the location of a building (whose use would change) may be undesirable if it is adjacent to other uses such as intensive poultry farming buildings, silage storage or buildings with dangerous machines or chemicals.

The existing building is located in open countryside, but to the south of established residential properties. The nearby uses are not considered to give rise to unacceptable levels of noise and disturbance to future occupations. The proposed dwellings would also be served by the necessary utilities and would be served by an existing access via the A350. On this basis, it is considered that the location and siting of the building are acceptable, and the location/siting of the building is not impractical or undesirable.

Design or external appearance of the building: Paragraph 131 of the NPPF highlights that good design is a fundamental aspect of sustainable development, helping to create better places in which people live and work, and making development more acceptable to communities.

Relevant to this application type, Paragraph 135 sets out key principles to ensure that new development:

- a) Functions well and contributes positively to the overall quality of the area, not just in the short term but over the lifetime of the development;
- b) Is visually attractive through high-quality architecture, thoughtful layout, and effective landscaping;
- c) Is sympathetic to local character and history, including the surrounding built environment and landscape setting;
- d) Creates places that are safe, inclusive, and accessible, promoting health and well-being and providing a high standard of amenity for both existing and future users.

² Planning Practice Guidance - Paragraph: 109 Reference ID: 13-109-20150305, Revision date: 05/03/2015 - [When is permission required? - GOV.UK](#)

The NPPF also encourages LPAs to make appropriate use of design tools and processes to assess and improve the quality of development proposals. This includes reference to national guidance such as the National Design Guide and assessment frameworks like Building for a Healthy Life, which support the delivery of well-designed, contextually appropriate development.

Whilst officers acknowledge that the proposed change of use of the agricultural building to a dwellinghouse would alter the appearance of the building, the overall proposed design would be acceptable, with the building retaining an agrarian appearance.

As such, despite some domestic features being introduced, the rural character of the building (particularly when viewed within the wider rural landscape) would be preserved and would remain sympathetic to the local character in line with the planning policy advice of the NPPF.

Provision of Natural Light: The prior approval matters to be assessed under para. Q.2(1)(g) relates to the provision of natural light into habitable rooms of the proposed dwelling.

For the purposes of the Part 3 (change of use) PD rights, para. X of the GPDO defines “habitable rooms” as:

...any rooms used or intended to be used for sleeping or living which are not solely used for cooking purposes, but does not include bath or toilet facilities, service rooms, corridors, laundry rooms, hallways or utility rooms.

The submitted elevation and floor plan drawings demonstrate that every bedroom and main living space would be served by openings and therefore it is considered that adequate light would be provided to the habitable rooms. Prior approval in relation to this matter is therefore not required.

Other matters – Ecology: As mentioned above, the application site is located within the consultation zone for bats associated with the Bath & Bradford on Avon Bats SAC and the Salisbury Plain SPA 6.4km recreational impact zone and therefore has the potential to result in significant adverse impact on the special features of those sites. It also falls within the yellow habitat impact zone and grey recreational impact zone of the TWBMS.

The Council’s ecology department has advised that the “*above potential HRA issues will need to be addressed via a Reg 77 application in due course. The applicants should be reminded of their obligations to comply with Article 3 - (1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to ensure that the development complies with regulations 75 to 78 of the Conservation of Habitats and Species regulations 2017. Failure to do so may result in the development not being Permitted Development*”. Therefore, an informative setting out this requirement would be imposed on any prior approval granted.

CONCLUSION: The proposed development has been assessed against the provisions, limitations, and conditions set out in Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Based on the submitted plans, supporting information, and the findings of this report, it is concluded that the proposal complies with the criteria for permitted development and therefore falls within the scope of Class Q.

Following assessment, prior approval is required in relation to the flood risk, specifically groundwater. Prior approval is granted, subject to the development being carried out in accordance with the submitted details and any conditions set out in this report.

RECOMMENDATION: Approval subject to conditions

APPENDIX 1 – PERMITTED DEVELOPMENT CHECKLIST CLASS Q		
Class Q – agricultural buildings to dwellinghouses		
		Yes / No
Q.	Permitted Development Note: <i>If the answer is "Yes" to any, proceed to assessment under Q.1. If the answer is "No" to all, the proposal does not qualify as permitted development under this class.</i>	
(a)	Does the development consist of change of use of: (i) a building and any land within its curtilage from use as an agricultural building, or (ii) a former agricultural building that was (but is no longer) part of an established agricultural unit and any land within that building's curtilage? to a use falling within Class C3 (dwellinghouses)?	YES
(b)	Does it include development referred to in sub-paragraph (a) together with the extension of the building referred to in sub-paragraph (a), or	N/A
(c)	Does it include development referred to in sub-paragraph (a) together with building operations reasonably necessary to convert the building referred to in sub-paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule or to extend that building?	YES
Q.1	Development is not permitted by Class Q if - Note: <i>If the answer to any of the questions below is "Yes", the proposed development would not constitute permitted development under this class</i>	
(a)	Was the site not part of the established agricultural unit: (i) on 24th July 2023, or (ii) where the site became part of the established agricultural unit after 24th July 2023, for a period of at least 10 years before the date development under Class Q begins?	NO – The site has been part of an established agricultural unit
(b)	Is the site no longer part of an established agricultural unit and either: (i) Was not part of one on 24 July 2023, (ii) Has not been part of one for at least 10 years before development begins, or (iii) Has been used for any non-agricultural purpose since leaving the unit?	N/A
(c)	Does any proposed dwelling exceed 150 square metres in floor space?	No – The submitted site layout plan (drawing no. 05 Rev B) confirms that each dwelling would measure 137m2
(d)(i)	Would the total number of dwellings on the agricultural unit (including previous Class Q developments) exceed 10?	NO
(d)(ii)	Would the total cumulative floor space of all dwellings on the unit exceed 1,000 square metres?	NO

(e)	Is the site occupied under an agricultural tenancy without written consent from both landlord and tenant?	NO
(f)	Was an agricultural tenancy terminated less than 1 year before development begins for the purpose of Class Q development, without written agreement that the site is no longer needed for agriculture?	NO
(g)	Has development under Class A(a) or B(a) of Part 6 (agricultural buildings/operations) occurred on the unit within the last 10 years?	NO
(h)	Would the development extend the building beyond its existing external dimensions, except for: (i) Extensions allowed under Q.1(i), or (ii) Protrusions up to 0.2m allowed under Q.1(j)(i)?	NO – No extensions are proposed and no protrusions beyond 0.2m
(i)	Would the proposed extension: (i) Have more than one storey? (ii) Be sited anywhere other than the rear? (iii) Extend more than 4m beyond the rear wall? (iv) Have eaves higher than the existing building? (v) Be taller than the highest part of the roof or 4m above ground? (vi) Extend beyond a side or principal elevation? (vii) Be sited on land not covered by a hard surface installed before 24 July 2023 or not in place for at least 10 years?	NO
(j)	Would the building operations include anything other than: (i) Installation/replacement of windows, doors, roofs, exterior walls, or services, or (ii) Partial demolition reasonably necessary for those operations?	NO
(k)	Is the site located on article 2(3) land (e.g., National Parks, AONBs, conservation areas)?	NO
(l)	Is the site or any part of it: (i) A Site of Special Scientific Interest? (ii) A safety hazard area? (iii) A military explosives storage area?	NO
(m)	Is the site or any part of it a scheduled monument?	NO
(n)	Is the building a listed building?	NO
(o)	Would the converted building (excluding extensions) fail to meet the nationally described space standard?	NO
(p)	Does the building lack suitable existing access to a public highway?	NO