



Mrs M Bromham  
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Contact: Jo Trask  
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Date: 14/03/2019

Dear Mrs Bromham

Location: Liongate House, Ladymead, Guildford, GU1 1BX  
Regarding: Liongate is a late 1980's office building situated on Ladymead and adjacent to the Stoke Intersection, which is the main access point from the A3 into Guildford. It comprises some 43,000 sq.ft (Net Internal) of offices, mainly on three floors on a site of approximately 1.36 acres. The property is leased at present but the Council expect it to be void by September 2019.

With the potential for a significant void within the GBC portfolio, LSH has been instructed to prepare an Options Appraisal for Liongate to consider the relative merits of the following:

- ?Refurbishment for continued office use
- ?Sale for residential with prior approval for Permitted Development (PD)
- ?Sale for residential use
- ?Sale for retirement living/care home
- ?Sale/pre-let as a hotel
- ?Sale for retail use
- ?Sale for self storage use

Corporate Property now need a steer from planning colleagues as to what uses would be considered and any planning constraints.

Reference: 19/A/00087

Thank you for your pre-application enquiry received on 14 February 2019. In response to your enquiry I hope that you will find the following information helpful.

#### Site description / constraints:

The site is located to the north side of Ladymead (A25). The A3 is located to the north of the site.

The site falls within an Area of High Archeological Potential, the Guildford Urban Area and an area of flood plain. The majority of the site is within Flood Zone 3b. The site is located within 400m to 5km of the Thames Basin Heaths Special Protection Area.

Lionsgate House falls within a Strategic Employment site as identified in the emerging local plan.

The emerging Guildford Borough Local Plan: strategy and sites (the Plan) is at an advanced stage of preparation. The Plan was submitted to the Secretary of State for Local Government on 13 December 2017 for examination in public, initial hearings have taken place. The Plan was initially found sound subject to modifications, these have been the subject of further consultation and hearings in early 2019. The Plan as submitted carries considerable weight.

#### Planning considerations:

For ease and clarity I have set out the planning considerations for each of the proposed uses.

#### Refurbishment for continued office use

No policy objection is raised to the refurbishment of the current building for office use.

#### Sale for residential with prior approval for Permitted Development

The building is located within flood zone 3b. Residential uses fall within 'more vulnerable' as identified in the Flood Risk Vulnerability Classification of the NPPG. In Flood Zone 3b residential development should not be permitted. As such there is an in principle objection. Any prior approval application would need to be accompanied by a site specific flood risk assessment. We would consult the Environment Agency on any prior approval application. However I must advise it is unlikely that prior approval would be granted, given the identified flood risk and 'more vulnerable' use.

#### Sale for residential use

As stated above residential uses are classified as 'more vulnerable'. There is an in principle policy objection to residential development in flood zone 3b. Should you be minded to pursue this route a site specific flood risk assessment in addition to a sequential test, an exception test would be required in any application submission.

The site is identified as a Strategic Employment site, notwithstanding my in principle objection above, any application for a change of use from employment to residential would also need to be supported by marketing evidence. Policy E3 of the emerging local plan states that on strategic employment sites comprehensive and active marketing should also include alternative suitable B class employment use and other employment generating use before change of use to residential or other use with no on-going employment use will be permitted. The site would need to be actively marketed for a period of 2 years for offices, retail, warehousing and/or other suitable employment generating use(s).

I draw your attention to the requirement for affordable housing set out in policy H2 of the emerging local plan.

#### Sale for retirement living/care home

Retirement homes, care homes and hotels all fall within 'residential uses' for the purposes of determining the vulnerability of a use in flood zone. There is an in principle objection to this use in

flood zone 3.

The site is identified as a Strategic Employment site, notwithstanding my in principle objection above, any application for a change of use from employment to residential would also need to be supported by marketing evidence. Policy E3 of the emerging local plan states that on strategic employment sites comprehensive and active marketing should also include alternative suitable B class employment use and other employment generating use before change of use to residential or other use with no on-going employment use will be permitted. The site would need to be actively marketed for a period of 2 years for offices, retail, warehousing and/or other suitable employment generating use(s).

#### Sale for retail use

The site is identified as a Strategic Employment site. Policy E3 of the emerging local plan states that on strategic employment sites continuous, comprehensive and active marketing for a period of at least 2 years should also include alternative suitable B class employment use before a change of use to uses other than B1, B2 or B8 are proposed. The site would need to be actively marketed for a period of 2 years for B1, B2 and B8 uses.

An application for retail use above 500 sqm would need to be accompanied by a retail impact assessment and a transport assessment.

#### Sale for self storage

Self storage falls within use class B8, Policy E3 sets out the definitions of uses falling within employment floorspaces as B1a, B1b, B1c, B2 and B8, For the purposes of this policy marketing evidence is not required for a proposed change of use from offices B1 to Self storage B8.

The main considerations would be scale, design, flooding, highways.

#### Sale for new office redevelopment

Provided that there is no increase in building footprint office redevelopment would be suitable from a flood risk perspective.

Subject to the scale, design, height, massing and parking provision.

#### Suggested amendments:

- refurbishment of current office use
- sale for redevelopment in employment use
- sale for self storage use

The above would be acceptable in principle subject to there being no increase in footprint and subject to scale and design.

If a non B1, B2 and B8 use is proposed, continuous, comprehensive and active marketing for employment uses will need to be carried out for a period of at least 2 years prior to the submission of an application.

- sale for redevelopment in retail use may be acceptable subject to marketing evidence.

Policy D2 of the emerging local plan requires major developments (1000 sqm gross new floorspace, or 10 or more residential units) to achieve a reasonable reduction in carbon emissions of at least 20 percent below the relevant Target Emission Rate (TER) set out in the Buildings

Regulations 2010 (as amended) (Part L). For major developments an Energy Statement is required as part of the submission.

Any redevelopment of the site would need to address the High Archaeological potential.

The existing site is developed, provided that there is no increase to the building footprint and no increase in the development vulnerability, redevelopment of the site may be acceptable under emerging local plan policy P4. This would only be the case where the development use falls within 'less vulnerable', provided there is no increase to the building footprint.

Any proposal to redevelop the site with a use that is 'less vulnerable' to flood risk would need to meet the exception test in the NPPF, by demonstrating that its sustainability benefits outweigh the flood risk, that the development would be safe to its users and occupiers throughout its lifetime and that it would not increase flood risk elsewhere (see exception test guidance in the NPPG) The proposal would also need to provide adequate mitigation for the lack of a permanently safe access and egress route, and there should not be any loss of flood plain storage (currently provided by the undercroft parking).

Additional consultees:

If you require further advice on highway matters contact Surrey County Council who are the relevant Highway Authority and offer their own pre-application advice service.

Environment Agency  
01276 454382  
[planning.frimley@environment-agency.gov.uk](mailto:planning.frimley@environment-agency.gov.uk)

Affordable Housing  
Helen Steward Housing Strategy and Enabling manager 01483 444242  
[helen.steward@guildford.gov.uk](mailto:helen.steward@guildford.gov.uk)

S.106 requirements:

SPA  
Recreation open space provision  
Affordable housing

Validation requirements:

Please review the Council's local validation list and local validation checklist, available on the Council's website at [www.guildford.gov.uk](http://www.guildford.gov.uk)

Estimated timescale for application:

This would be a major application and therefore has a target determination period of 13 weeks.

Relevant planning history:

None.

Conclusion:

The above information is provided solely on the principle of the uses proposed. It does not

consider any scale, design, environmental or highways issues. I would strongly recommend further pre application advice is sought on any future proposals for the redevelopment of the site. Please be advised that residential uses in flood zone 3b are unsuitable and would not be supported.

Please note that this advice represents officers' informal opinion based upon the information you have provided. It is given without prejudice to any decision the Council may make on any subsequent formal planning application. A planning application will be the subject of publicity and consultation in accordance with the Council's procedures. These and other matters which may subsequently come to light, may result in additional issues being raised that are pertinent to the determination of the application.

Yours sincerely

Mrs J Trask  
Planning Officer  
Planning Services