

15 July 2021

Ms K. Porter
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Dear Ms Porter,

Highfield Building, Former Syngenta Site, Henley Old Road, Fernhurst, West Sussex, GU27 3JE
Application for Prior Approval
Planning Portal Reference: PP-09956936

On behalf of our client, Comer Homes ("the Applicant"), I write to submit, online via the Planning Portal (reference: PP-09956936) details pursuant to the 'prior approval' of the conversion of the above site into residential accommodation. The proposals comprise 235 new one, two and three bedroom flatted units under Class O of the Town and Country Planning (General Permitted Development Order) 2015 (as amended).

The application comprises the documents set out below:

- Application Form;
- CIL Additional Questions Form
- Site Plan – drawing no. 476_B1_01_01;
- Proposed Ground Floor – drawing no: 476_B1_02_01;
- Proposed First and Second Floor - drawing no: 476_B1_02_02;
- Transport Assessment and Travel Plan, prepared by Yes Engineering;
- Flood Risk Assessment, prepared by EAS;
- Contamination Note, prepared by Landmark Information.

The planning application fee of £96.00 plus Planning Portal administration charge (£28) will be paid online or over the phone following submission.

Background

This application follows from a previous prior approval application for the site (ref: SDNP/14/01014/DCOUPN), which approved the change of use from offices (B1) to provide 213 flats (Use Class C3), in April 2014. The permission was never implemented and has therefore expired. The approved plans have subsequently been revised and optimised in order to provide an improved mix of units which are more attractive to the local market.

Planning permission was obtained in October 2021 for redevelopment of the wider site for up to 210 residential units including a café and community use, retention of existing Pagoda building and landscaping and associated access and parking.

Site Description

The application site forms part of the 10.5 hectare former 'Syngenta' site, which is located to the east of (and accessed from) the A286 Midhurst to Haslemere Road, approximately 2km to the south of Fernhurst Village. Whilst the wider Syngenta site was developed as an army barracks at the end of World War II, the site was redeveloped in the 1980's specifically as the UK headquarters for ICI. It is largely the remnants of this that remain on the site today.

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There are two parts to the Former Syngenta site: Highfield and Longfield. The principal office building on the Highfield site is known as Highfield House, which is the site that forms the subject of this application and has been largely vacant without any permanent use since the 1990s when it became surplus to requirements. The Longfield site is occupied by several commercial companies, including Nicholson's Auctioneers.

The wider Highfield site contains a number of buildings, including the very large three storey Highfield office building and four storey Conference Centre (pagoda/ziggurat) both connected by a covered walkway. It is thought that these were built in the 1980s. Also on the site are a number of smaller buildings towards the north eastern corner including a single storey workshop building. The Longfield building is on the western part of the site. There are substantial areas of hardstanding, previously used as car parking, across much of the site. It is relatively well screened by existing mature trees and other vegetation.

The Pagoda Building is in separate occupation and is not included in this application.

The site sits within Verdley Wood and is adjoined to the east and south by Ancient Woodland (Ash Reeds Copse and Dawes Highfield Copse). The site is also bound to the north by the Cooksbridge Meadow Nature Reserve.

According to the Environmental Agency's Flooding Map, the site is situated within Flood Zone 1, where there is a low risk of flooding.

The site has no local or statutory listed buildings within its boundary. The Kings Arms Inn to the west of the site is Grade II listed.

The site is in proximity to a range of public transport infrastructure. Midhurst Road (A286) is a bus route, with northbound and southbound stops providing services to Guildford and Midhurst. Both stops are within easy walking distance of the site (less than 400m walk to both stops). Furthermore, Haslemere station is located within a 10 minute drive North of the site which provides direct services to London Waterloo, as well as Portsmouth and Southsea.

The site is allocated by Policy SA1 in the Fernhurst Neighbourhood Plan (made on 14 April 2016) for a sustainable mixed-use development incorporating residential and commercial development.

Planning History

A desk-top search of South Downs' public access has identified a number of planning applications relevant to the site, the details of which are below.

LPA Reference	Description of Development	Decision / Date
SDNP/19/00913/FUL	Construction of up to 210 dwellings (Use Class C3) and 233sqm of café (Use Class A3), retail (Use Class A1) and community use (Use Class D1 / D2) buildings, retention of existing Pagoda building and associated commercial use (Use Class B1) and landscaping and associated access and parking works, following demolition of the Highfield building and other buildings / structures.	Approved 21 October 2020
SDNP/14/01014/DCOUPN	Prior Notification for change of use for Highfield Building from B1(a) Offices to Residential (Use Class C3)	Approved 11 April 2014

SDNP/13/03520/LDE	Certificate of Lawful Use or Development (Existing)	Approved 20 December 2013.
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Proposal

The proposal comprises the change of use of the existing Highfield office building into residential accommodation to provide 235 apartments, made up of 155 no. x one bed properties, 65 no. x two bed properties, 15 no. x three bed properties and replacing the existing office space (Use Class B1a).

All work is proposed under permitted development rights.

The proposed residential mix is as follows:

Level	1 Bedroom	2 Bedroom	3 Bedroom	Total Units
Ground Floor	55	19	5	79
First Floor	50	23	5	78
Second Floor	50	23	5	78
Total	155	65	15	235
%	86.2%	8.7%	5.10%	100%

There are 79 units proposed across the ground floor and 78 units across each of the first and second floors of the property, comprising of a mix of one, two and three bedroom flats which are generously sized and each include lounge/dining/bedroom and bathroom facilities.

The units comply with nationally prescribed space standards.

522 car parking spaces are allocated for the proposed development.

Class O Permitted Development Rights

The Government introduced the permitted development right in 2013. It has been subsequently been amended and the relevant legislation is now the Town and Country Planning Act (General Permitted Development) (England) Order 2015 (as amended). Development proposals comprise a 'Class O' development where conversion is proposed from an existing Class B1 (a) office to Class C3 residential dwellings. Class O of Schedule 2, Part 3 states:

"Development under Class O 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) Contamination risks on the site; and*
- c) Flooding risks on the site,*
- d) Impacts of noise from commercial premises on the intended occupiers of the development, and*

e) *the provision of adequate natural light in all habitable rooms of the dwellinghouses.*

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

Development under Class O is permitted subject to the condition that it must be completed within a period of 3 years starting with the prior approval date.

Assessment

Transport and Highways Impacts

Trip Generation

A Transport Assessment (TA) has been prepared by Yes Engineering, to assess the travel patterns associated with the buildings existing use as offices in relation to its planned use as residential flats following its conversion.

The Transport assessment demonstrates that based on the trip rates for the proposed residential development is predicted to generate an additional 6 vehicle movements in the morning peak hour and 8 vehicle movements in the evening peak hour when compared with the consented scheme. It is therefore clear as a consequence of development there will be a negligible impact on the highway network.

The application site is accessible by modes of transport other than the private car with bus stops located on the A286 either side of the junction with Henry Old Road providing access to the surrounding area including Haslemere Station. Haslemere Station is approximately 5-miles to the norther of the site providing access to fast train services between Portsmouth Harbour and London Waterloo. The public transport provision, along with the secure and covered cycle parking within the site will encourage residents to use an alternative mode to the private car.

The TA identifies that refuse collection will be undertaken within the site. It is proposed that each flat block has its own bin store located within easy access to the central spine road within the site to allow kerbside collection. All refuse storage areas will provide adequate space to accommodate waste storage for all the waste streams and within the required collection distance for waste management operatives.

NPPF paragraph 109 states that ‘development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’ As demonstrated within the TA, the impacts are not severe.

The TA concludes that overall there are no highway or transportation reasons to object to the proposed development.

A Travel Plan has also been prepared by YES Engineering to support this application. This identifies a series of targets for mode shift towards sustainable modes of travel alongside a series of measures to seek to achieve those targets.

Parking

Policy SD22: Parking Provision of the South Downs Local Plan identifies that development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality.

Yes Engineering have completed the Parking Calculator using the Fernhurst Ward (where the site resides) and the proposal to allocate two parking spaces per residential unit. A copy of the completed spreadsheet is attached as Appendix C of the Transport Assessment where it can be seen that 521 car parking spaces are required for the 235 residential units.

It is the intention to retain 522 car parking spaces on-site as shown in Appendix A of the Transport Assessment. A total of 26 car parking spaces (5%) will be Blue Badge parking in accordance with the SPD.

A total of 522 car parking spaces are proposed. The Transport Assessment identifies that 174 residents of the 404 of working age that are anticipated to live in the new development are expected to drive to work. The 522 parking spaces available for the residential development should therefore be ample.

The SPD requires that the flats will have for long stay purposes 1 cycle space per bedroom and 1 short stay cycle space per 5 flats. The long stay provision needs to accommodate 1 larger cycle per 5 flats and the short stay provision 1 larger cycle per 10 flats. The development of 235 flats is to have a total of 330 bedrooms, which equates to 330 long stay spaces and 47 short stay spaces. Of these 47 of the long stay spaces (5% of flats) and 24 of the short stay spaces (10% of flats) will be capable of accommodating larger cycles.

The development proposals are therefore considered to be wholly acceptable in transportation planning terms and meets the transport and highways requirements for 'Prior Approval' as defined within the General Permitted Development Order.

Contamination Risks

A desk-based Envirocheck Report has been carried out using Landmark Information, which identifies that there are no contaminated land register entries or notices on the site or within 1000m of the site. On the basis of the information obtained to date, the site is therefore not registered as Contaminated Land under Part 2A Section 78A (2) of the Environmental Protection Act 1990.

In addition, as the proposed change of use would only involve internal reconfiguration and no intrusive ground works it is unlikely that the change of use would pose a risk to future residents. The existing use and surrounding area of the site is characterised by predominately office and warehouse / auction house uses which do not typically emit any harmful contaminants.

The principle of residential use at the site has already been established through the prior approval of application ref: SDNP/14/01014/DCOUPN (and recent planning permission for wider redevelopment of the site), in which it was proposed to provide 213 new residential apartments across the unit. There have been no changes to affect the conclusions in respect of contamination since the grant of the original prior approval.

The development proposals are considered to be wholly acceptable with regards to potential risk of contamination on site and therefore meet the requirements for 'Prior Approval' as defined within the General Permitted Development Order.

Flood Risk

A Flood Risk Assessment has been prepared by EAS, and is submitted to accompany the application.

The Flood Risk Assessment the site is within Flood Zone 1, suggesting a low overall probability of flooding from fluvial / coastal sources.

The Flood Risk Assessment identifies that in a low risk scenario, i.e. a probability of surface water flooding between 1 in 100 and 1 in 1000 each year (the least frequent but worst-case scenario) surface water flooding would be present along the perimeter of the building and surrounding car park area. However, in practice, it is highly unlikely that surface water would reach the building and is likely to pool in the low points of the site as opposed to entering the building. The surface water mapping used is also based on the existing drainage systems within the site and surrounding area being completely blocked, and so it is considered a residual risk.

All sources of flooding have been assessed to be low risk.

Given the nature of a conversion, flood mitigation measures will need to be retrofitted as part of the conversion. The finished floorlevels of the building entrance leading into the foyer will be raised by 300mm. Measures such as using sacrificial materials in the entrance halls which can be easily replaced should a flood event occur as well as raising electric sockets and meters will limit the damage caused in a flood event. It is recommended that a private domestic warning system is installed, which would include sensors located around the building to detect rising surface water, alerting residents should a flood event occur. Demountable flood gates are recommended at all entrances and could be deployed when the alarm system detects the presence of flood waters at the building entrances.

The Flood Risk assessment concludes that there are to be no increases in impermeable area at the site so no increase in surface water runoff. As such, there are no planned alterations to the existing surface water drainage system serving the building.

Noise Impacts

The predominant use within the vicinity of the site is office / storage (Aspinal of London Headquarters) and an Auction House). It is considered that these uses create minimal noise emissions and will therefore not be an issue for the proposed residential use.

The development proposals are considered to be wholly acceptable with regards to potential noise impacts of the surrounding area, especially in light of the approved scheme in April 2014 (Reference: SDNP/14/01014/DCOUPN), which identified that the site was suitable for residential use. The proposed scheme therefore meets the requirements for 'Prior Approval' as defined within the General Permitted Development Order.

Furthermore, planning permission was obtained in October 2021 for redevelopment of the wider site for up to 210 residential units and retention of the existing Pagoda building. It was therefore considered that the uses were compatible and this remains the case for this proposal where residential is also proposed.

Adequate Natural Light

The proposed residential units would be served by large windows and dual aspect units have been created wherever possible. Every habitable room has a window. The internal unit layouts position habitable rooms to the external side of the unit to maximise natural light and achieve adequate living conditions for future occupiers.

The proposed dwellings across the ground, first and second floors therefore demonstrate the provision of adequate natural light into all habitable rooms and therefore can be considered acceptable in terms of design. The proposed scheme therefore meets the requirements for 'Prior Approval' as defined within the General Permitted Development Order.

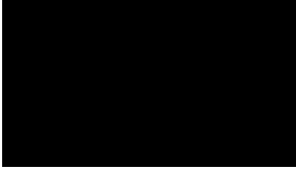
Conclusion

- It is proposed to convert the ground and first floor (Class B1a) into residential accommodation (Class C3), providing 235 new one, two and three bedroom flats.
- There are no highways, flooding, contamination, undesirable issues for the change of use or design reasons why the development should not proceed.
- The conversion of the unit will make a much needed contribution to housing supply in Fernhurst.

For the reasons listed above, it is considered that sufficient information has now been submitted to enable your Council to confirm that development may now proceed. Please do not hesitate to contact should you require any further information.



Yours sincerely



Catherine Mason
Associate Director