

23/P/00592 - Westthorpe, Holford Road, Guildford



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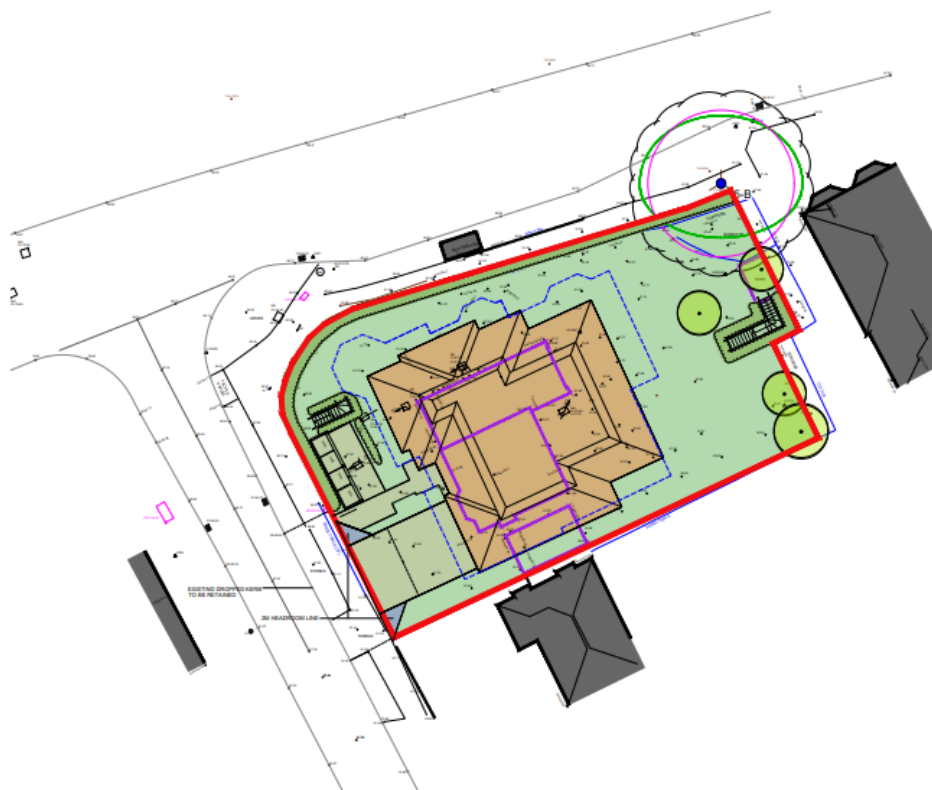


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GUILDFORD
BOROUGH

23/P/00592 – Westthorpe, Holford Road, Guildford



Not to scale

App No: 23/P/00592

8 Wk 31/08/2023

Deadline:

Appn Type: Outline Application

Case Officer: Katie Williams

Parish: Merrow

Ward: Merrow

Agent :

Applicant: Mr Shea
Fortitudo Ltd
153 Commercial Road
Poole
BH14 0JD

Location: Westthorpe, Holford Road, Guildford, GU1 2QE

Proposal: Outline Application for demolition of existing buildings and erection of 7 apartments with associated parking (access, appearance, layout and scale to be considered).

Executive Summary

Reason for referral

This application has been referred to the Planning Committee because more than 20 letters of support have been received, contrary to the Officer's recommendation.

Key information

This is an outline application for the demolition of existing buildings and erection of 7 apartments with associated parking (access, appearance, layout and scale to be considered).

The application has been submitted as an outline application, however the only matter reserved is that of landscaping.

Proposed building dimensions:

Width: 17m (max)

Depth: 17m (max)

Height: 9.7m (max)

Parking: 11 car spaces and 12 cycle spaces to be provide in basement level car park beneath the proposed new apartment building.

Summary of considerations and constraints

The application site is located within the Urban Area of Guildford and within the 400m to 5km buffer zone of the Thames Basin Heath SPA.

The site lies within the Urban Area where the principle of development is acceptable.

However, there are several significant concerns regarding the application, including: the impact on the context and character of the area, impact on neighbouring amenity, proposed housing mix, impact on trees and vegetation, standard of amenity for future occupants, impact on biodiversity and the impact on the Thames Basin Heath SPA.

The application is therefore recommended for refusal.

RECOMMENDATION:

Refuse - for the following reason(s) :-

1. The proposed development, due to the overall scale, bulk, massing, height, poor design and proportions of the proposed apartment building, incorporating large areas of flat roof, together with its prominent corner position and limited spacing to the southern side boundary, would result in a development which would appear overly prominent, incongruous and overbearing within the street scene within both Holford Road and Epsom Road and would adversely impact on the context and character of the surroundings. Furthermore, the extent of the proposed basement and the scale of excavation required has the potential to adversely impact on existing boundary vegetation including a Category B Sycamore tree which sits adjacent to the north eastern boundary (outside of the site). No detail has been provided to

demonstrate that existing trees and hedging could be retained or whether replacement or additional planting and soft landscaping could successfully become established following the level of excavation proposed for the basement car park. The lack of an appropriate and sympathetic landscaping scheme would further exacerbate the adverse impact of the proposal on the verdant character of the surroundings. The proposal fails to accord with the requirements set out in Para 130(a to d) of the NPPF, or Policy D1 of the LPSS and Policy D4 of the LPDMP.

2. The proposed development would not provide a mix of housing tenures, types and sizes. The proposal therefore does not comply with Policy H1(1) of the LPSS 2015-2034.
3. The proposed development, due to the limited distance between the rear elevation of the proposed apartment building and the boundary with 162 Epsom Road, together with the number and type of windows proposed in the rear elevation, at first and second floor level, will result in a detrimental level of overlooking towards the ground and first floor windows on the western flank elevation of 162 Epsom Road. The proposal will subsequently result in an unacceptable loss of privacy to the occupants of this neighbouring property. The proposal is therefore contrary to Policy D5 of the LPDMP and Para 130(f) of the NPPF.
4. The proposed development, due to the scale, bulk and height of the proposed building, its projection beyond the rear elevation of 1 Holford Road and its proximity to the boundary for a significant depth, together with the stark design of the flank elevation and bulky roof design, would have an unacceptable overbearing impact on the rear and side windows and rear garden area of this neighbouring property. The proposal is therefore contrary to Policy D5 of the LPDMP and paragraph 130(f) of the NPPF.
5. Due to the lack of provision for any outdoor private amenity space for the occupants of the proposed development, it is concluded that the development proposed would result in a poor standard of amenity for future occupiers of the development and the proposal does not comply with the objectives of policy H1 and D1 of the LPSS and Para 130(f) of

the NPPF or the requirements of Policy D5 of the LPDMP and Para 130(f) of the NPPF.

6. From the information submitted with the application, the Local Planning Authority cannot be satisfied that the proposed development would achieve a net gain in biodiversity. The proposal is therefore contrary to Policy ID4 of the LPSS and Policy P7 of the LPDMP.
7. The proposed development would result in a significant amount of ground excavation in close proximity to a Category B Sycamore tree which lies adjacent to the site as well as existing mature hedging on the site boundaries. The existing tree and hedging make a positive contribution to the visual amenity of the area. Insufficient information has been provided to demonstrate that the proposal would not have an adverse impact on the health of the tree and hedging or subsequently the contribution to visual amenity they provide. The proposal is therefore contrary to Policy D4 and P6 of the LPDMP.
8. It has not been demonstrated to the satisfaction of the County Highway Authority that safe and suitable access can be gained to/from the proposed development. Therefore, the proposal is contrary to the Guildford Local Plan (2019), policy ID3 and the National Planning Policy Framework 2023.
9. The application lacks sufficient information to demonstrate that the proposed parking layout and ramp access would provide adequate accessible parking provision for the proposed flats. It has also not been satisfactorily demonstrated that without accessible parking there would not be a resultant adverse impact on highway safety or movement of the other road users resulting from overspill parking and from vehicles turning and manoeuvring to access the site. The proposal is therefore contrary to Policy ID10 of the Local Plan Development Management Policies 2023 and the Council's Parking Standards for New Developments SPD 2023.
10. The site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). The Local Planning Authority is not satisfied that there will be no likely significant effect on the Special

Protection Area and, in the absence of an appropriate assessment, is unable to satisfy itself that this proposal, either alone or in combination with other development, would not have an adverse effect on the integrity of the Special Protection Area and the relevant Site of Special Scientific Interest (SSSI). In this respect, significant concerns remain with regard to the adverse effect on the integrity of the Special Protection Area in that there is likely to be an increase in dog walking, general recreational use, damage to the habitat, disturbance to the protected species within the protected areas and road traffic emissions. As such the development is contrary to the objectives of policy NE4 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24/09/07), policy P5 of the Guildford Borough Local Plan: Strategy and Sites (LPSS) 2015-2034 and conflicts with saved policy NRM6 of the South East Plan 2009.

For the same reasons the development would fail to meet the requirements of Regulation 63 of The Conservation of Habitats and Species Regulations 2017 as amended, and as the development does not meet the requirements of Regulation 64 the Local Planning Authority must refuse to grant planning permission.

Informatives:

1. This decision relates expressly to amended drawing(s) DS-005-2023-C (Site, Block and Location Plans), DS-005-2023-C (Floor Plans 1 of 2), DS-005-2023-C (Floor Plans 2 of 2), DS-005-2023 (Elevations), DS-005-2023-C (Site Section) and DS-005-2023-C (Street Scene) received 23 November 2023.
2. This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:
 - Offering a pre-application advice service in certain circumstances
 - Where pre-application advice has been sought and that advice has been followed we will advise applicants/agents of any further issues

arising during the course of the application

- Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process

However, Guildford Borough Council will generally not engage in unnecessary negotiation for fundamentally unacceptable proposals or where significant changes to an application is required.

In this case pre-application advice was not sought prior to submission and as there are significant objections to the application that minor alterations would not overcome, it was not considered appropriate to seek amendments through the course of this application.

3. It is noted that there are several discrepancies in the submitted elevation drawings and a proposed site levels plan has not been provided to correspond with the proposed street scene drawing.

Officer's Report

Site description.

The application site is located within the Urban Area of Guildford and within the 400m to 5km buffer zone of the Thames Basin Heath SPA.

The site is comprised of a corner plot, incorporating a two storey detached dwelling with single storey additions and garden area, on the corner of Holford Road and Epsom Road. There is mature hedging running along the front and side boundaries of the site, including along the boundary frontage with Epsom Road.

The existing dwelling fronts on to and is accessed via Holford Road. Holford Road is comprised of predominantly 1930 and 1950s style, two storey detached and semi-detached dwellings on spacious plots, with boundary vegetation to their side boundaries, and low level hedging or boundary walls to the front boundaries. The road slopes up from the start of the road (where the application site is located) southwards towards the end of the road which adjoins Merrow Downs. As a result of this sloping topography, the neighbouring dwelling to the south, 1 Holford Road,

sits at a slightly higher ground level, and ridge heights of the adjacent dwellings step up following the natural topography of the road.

To the east of the site, are two storey Victorian dwellings which front onto Epsom Road. To the opposite side of Holford Road, to the west, are two storey detached dwellings on spacious plots, set back from the road, with mature trees and vegetation to the boundaries. On the opposite side of Epsom Road (to the north) is a mature tree belt which is covered by a Tree Preservation Order.

Proposal.

Outline Application for demolition of existing buildings and erection of 7 apartments with associated parking (access, appearance, layout and scale to be considered).

The application has been submitted as an outline application, however the only matter reserved is that of landscaping.

Proposed building dimensions:

Width: 17m (max)

Depth: 17m (max)

Height: 9.7m (max)

Parking: 11 car spaces and 12 cycle spaces to be provide in basement level car park beneath the proposed new apartment building.

Cross-section drawings have not been provided to show the depth of excavation required for the proposed car park. However, the proposed basement level floor plan shows that the basement level car will extend to within close proximity of all of the site boundaries (including front and rear) therefore almost to the full depth and width of the existing plot.

The following additional documents have been submitted during the course of the application:

- updated Noise Impact Assessment (12 July 2023)
- Air Quality Assessment (12 July 2023)

- Transport Note (12 July 2023)
- Energy Statement (13 July 2023)
- Sustainability Statement (13 July 2023)
- Biodiversity Net Gain Assessment (4 August 2023)
- Drainage Strategy (June 2023)
- Refuse strategy plan (2 August 2023)
- street scene drawing (31 October 2023)

Amended and additional plans (received 23 November 2023):

The following amended / additional plans have been submitted during the course of the application:

- proposed cross-section drawings
- amended proposed street scene to show existing and proposed site levels
- revised proposed elevation drawings to corrected on original proposed elevations, including increase in ridge heights to side elevations(to match rear elevation)

[It is noted that the agent has confirmed that it is proposed that there will be a reduction in ground level across the site of circa 500mm (from existing) as indicated on the submitted cross-section drawings. However, a drawing to show details of the proposed finished floor levels has not been provided. It is also noted that there are still some discrepancies shown on the amended plans, between the elevation, roof plan and floor plan drawings.]

Housing Mix

Market	Proposed	SHMA % req
1 bed flat/house	0%	10% (1)
2 bed house	100% (7)	30% (2)
3 bed house	0%	40% (3)
4+ bed house	0%	20% (1)
TOTAL	7	

Relevant planning history.

22/P/00711 - Outline application for demolition of existing buildings and erection of a block of 11 flats with associated parking and landscaping (access, appearance, layout & scale to be considered). Withdrawn

Consultations.

Statutory consultees

County Highway Authority:

- the proposed development has been considered by the CHA who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused on the grounds that it has not been demonstrated to the satisfaction of the CHA that safe and suitable access can be gained to/from the proposed development. Therefore, the proposal is contrary to the Guildford Local Plan (2019), policy ID3 and the National Planning Policy Framework 2023.
- the proposed access ramp to/from the car parking area is at a gradient of 1:6. This gradient is deemed too steep and is not suitable for safe access to/from the parking area.

Thames Water:

- No comments

Non-statutory consultees

Local Lead Flood Authority (Surrey County Council):

- the Applicant has considered the surface water flood risk to and from the site and has suggested appropriate mitigation measures to inform the Planning Application.
- the LLFA are content that the drainage strategy is acceptable. However, during the detailed design stage consideration should be given to ensure that mitigation measures are in place to avert potential surface water flooding in the basement/car parking area.
- currently, it is unclear how the basement will be drained and mitigate surface

water runoff. Ideally, a detailed design plan illustrating how surface water will be dealt with in the basement/car parking area would finalise the drainage strategy.

- conditions recommended

Internal consultees

Head of Environmental Health and Licensing:

- no objection, conditions recommended relating to road noise mitigation and air quality considerations

Operational and Technical Services

- following receipt of a refuse strategy plan, no objection

Tree Officer:

- Additional information required

Amenity groups/Residents associations

Merrow Residents Association:

- design and character of the proposed build will not reflect the distinct local character of the area
- adverse impact on the street scene from bulky, brick built block of flats with underground parking
- adverse impact on highway safety from access to the proposed building and car park near the corner of a busy main road, school children and other pedestrians would be at risk
- together with overflow kerbside parking, there is a real potential for collision and harm
- adverse impact on amenities of residents, in terms of noise, vehicle emissions and loss of privacy

Following the receipt of amended plans an additional letter has been received reiterating the original comments.

Guildford Society:

Object:

- the proposed design has a mass and scale that doesn't respect the surrounding area which is of loose grain
- the Epsom Road in this area has a different character to the more urban character near the Town Centre where significant blocks of flats have been introduced in the area around Albury Road, Upper Edgeborough Road
- the development will be close to boundaries and will present a mass and scale that is totally out of character
- proximity of basement parking access to junction with Epsom Road, impact on existing traffic problems
- the development proposes the use of gas boilers, more sustainable alternatives should be encouraged

Third party comments:

102 letters of representation have been received raising the following objections and concerns:

- detrimental impact on the character and appearance of the surrounding area
- bulky, unattractive building, detrimental impact on the character of the street scene
- overdevelopment of a small plot
- design is out of keeping and incongruous with the surrounding area
- overbearing appearance
- density of development is out of keeping within the local area
- large area of flat roof emphasises its bulky form
- front elevation dominated by car park entrance
- harm to neighbouring amenity, loss of privacy, loss of light, overshadowing, overbearing impact
- impact on highway safety, especially at peak school times when children are going to school on foot to nearby schools
- safety of access close to junction of Holford Road and Epsom Road

- would increase traffic in an already congested and polluted part of Guildford
- insufficient parking, will exacerbate existing parking pressures on Holford Road and surrounding roads
- underground car park is out of keeping with Merrow, with no precedent in the area
- GBC are already exceeding its housing supply and delivery targets
- would set a precedent for redeveloping other existing family homes into flats, destroying the pleasing aesthetics of Guildford's many similar residential areas
- no mix of housing, comprises solely two-bedroom flats
- does not respond to distinctive local character of the area, including the landscape character
- noise, disturbance and disruption during construction
- proposed basement parking will require significant excavation
- structural impact to neighbouring property from basement construction
- would add to existing pollution
- impact on existing infrastructure
- flood risk, surface water run-off / drainage
- environmental impact from excavating earth for underground car park
- lack of sustainability measures
- electricity sub-station will need upgrading
- there is a shortage of 2/3 bedroom houses for families, do not need more flats
- there are currently 3 major developments of flats proposed or already underway in Guildford Town Centre - Guildford Station, former Debenhams site, North Street
- pressure on local services, doctors and dentists
- hard to discern from the drawings the relative ridge height to adjoining properties [Officer note: a street scene drawing was submitted on 15 November 2023]
- allows very little space for landscaping, would lead to the loss of valuable green space
- reduced spacing to neighbouring properties
- refuse storage / collection arrangements
- noise and disturbance from cars using the car park ramp
- Design and Access Statement is inaccurate
- no details provided regarding depth of excavation required
- concern regarding how new tree planting will work above basement area
- impact on existing trees
- impact on vegetation on boundaries with neighbouring properties

- front elevation drawing does not show side facing dormer windows
- arboricultural and bat survey reports are out of date
- development would be in breach of restrictive covenants
- proximity of basement excavation to electricity sub-station
- trees removed from the plot prior to application being submitted
- requirement for air quality assessment [Officer note: An Air Quality Assessment has been submitted with the application (received 12 July 2023)]
- requirement for traffic impact assessment, assessing impact in relation to nearby schools
- lack of EV charging

22 letters of support have been received outlining the following positive comments:

- the design is architecturally attractive
- fits in with the street scene
- there is a number of other flatted developments within close proximity to the proposed development site
- a net gain of 6 new homes to the area is a direct benefit to the community and provides a sustainable development approach
- sustainable location
- underground car park provides secure parking
- the built form has reduced to a more suitable size
- prevents future development into the Green Belt and area of natural beauty
- visually attractive compared to the existing building
- sustainability benefits
- efficient use of the land
- economic benefits
- brownfield development should be encouraged
- will contribute to the Council's housing delivery targets
- will help younger generation to get on to the property ladder

Following the receipt of amended plans (received 23 November 2023) 28 further letters (from third parties who had previously commented on the application) have been received reiterating the original comments and making the following further points:

- noise and air pollution from mechanical ventilation to the basement car park

- supporting information does not mention lowering / excavation of ground levels across the site
- impact of proposed excavation on mature tree on site boundary
- safety concerns regarding car park ramp
- poor car park design would lead to additional on-street car parking
- the new cross-section drawing shows that the proposed building would be higher than previously shown
- noise impact assessment states that a 2.5m acoustic barrier needs to be installed around the property to mitigate the elevated noise levels from Epsom Road, would adversely impact on the street scene
- further clarification required regarding biodiversity net gain
- biodiversity loss
- drawings are still inaccurate

Planning policies.

National Planning Policy Framework (NPPF) 2021:

Chapter 2: Achieving sustainable development

Chapter 4. Decision making

Chapter 5: Delivering a sufficient supply of homes.

Chapter 11. Making effective use of land

Chapter 12: Achieving well-designed places.

Chapter 14: Meeting the challenge of climate change, flooding and coastal change.

Chapter 15: Conserving and enhancing the natural environment

Guildford Borough Local Plan: Strategy and Sites (LPSS), 2015-2034:

The Council is able to demonstrate a five year housing land supply with an appropriate buffer. This supply is assessed as being 6.46 years based on most recent evidence as reflected in the GBC LAA (2022). In addition to this, the Government's recently published Housing Delivery Test indicates that Guildford's 2021 measurement is 144%. For the purposes of NPPF footnote 8, this is therefore greater than the threshold set out in paragraph 222 (75%). Therefore, the Plan and its policies are regarded as up-to-date in terms of paragraph 11 of the NPPF.

S1: Presumption in favour of sustainable development
H1: Homes for all
P5: Thames Basin Heaths Special Protection Area
D1: Place shaping
D2: Climate change, sustainable design, construction and energy
ID1: Infrastructure and delivery
ID3: Sustainable transport for new development

ID4: Green and blue infrastructure

Guildford Borough Council: Development Management Policies (LPDMP) 2023:

Guildford's Local Plan Development Management Policies (LPDMP) was adopted by the Council on 22 March 2023. This now forms part of the statutory development plan and the policies are given full weight.

Policy P6: Protecting Important Habitats and Species
Policy P7: Biodiversity in New Developments
Policy P11: Sustainable Surface Water Management
Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Policy D5: Protection of Amenity and Provision of Amenity Space
Policy D6: External Servicing Features and Stores
Policy D7: Public Realm
Policy D8: Residential Infill Development
Policy D14: Sustainable and Low Impact Development
Policy D15: Climate Change Adaptation
Policy D16: Carbon Emissions from Buildings
Policy ID10: Parking Standards

South East Plan 2009:

NRM6Thames Basin Heath Special Protection Area
Supplementary planning documents:

National:
National Design Guide (2021)

Local:

Residential Design Guide (2004)

Parking Standards for New Development (2023)

Thames Basin Heaths Special Protection Area Avoidance Strategy (2017)

Climate Change, Sustainable Design, Construction and Energy (2020)

Planning Contributions (2017)

Surrey County Council Vehicular and Cycle Parking Guidance (2012)

Landscape Character Assessment (2007)

Residential Design Guide (2004)

Planning considerations.

The main planning considerations in this case are:

- the principle of development
- housing mix
- scale, character and design
- the impact on heritage assets
- the impact on neighbouring amenity
- amenity of future occupiers
- highways / parking considerations
- the impact on protected species / biodiversity
- the impact on trees and vegetation
- sustainability
- Thames Basin Heath SPA
- balancing exercise

Principle of development

The site is within the Urban Area of Guildford. As such, there is no in-principle objection to development in this location providing the proposals accord with the relevant local and national policies.

Housing mix

Policy H1 of the LPSS 2015-2034 states that new residential development is required to deliver a wide choice of homes to meet a range of accommodation

needs as set out in the latest Strategic Housing Market Assessment (SHMA). New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location. However, it is important to note that policy H1(1) of the LPSS is not intended to be applied in a prescriptive manner. It is a broad assessment of the needs required over the plan period and should be used to guide development proposals. In applying the mix, consideration needs to be given to site specific matters which together would shape the appropriate mix on particular sites.

It is noted that the SHMA mix is a mix to be achieved over the whole of the housing market area and over the lifetime of the plan. It is not feasible or practical to require every site to rigidly meet the SHMA requirement. However, the application proposes the provision of development comprising of 2 bedroom flats only, providing 7 x 2 bedroom units. As such, there is no mix in unit types or sizes proposed. The proposal would therefore not comply with the requirements of Policy H1, due the lack of any mix in the size or type of units. No information has been provided to demonstrate that there is an overriding requirement for 2 bedroom flats in this location. It is therefore concluded that the proposed housing mix does not comply with Policy H1 of the LPSS 2015-2034.

Scale, character and design

Para 130 of the NPPF stipulates that developments:

- a) “will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development”;
- b) “are visually attractive as a result of good architecture, layout and appropriate and effective landscaping”;
- c) “are sympathetic to local character and history, including the surrounding built environment and landscape setting”;
- d) “establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit”;

LPSS Policy D1 (‘Place Shaping’) requires new development to achieve high quality design that responds to the distinctive local character (including landscape character) of the area in which it is set. Para 4.5.12 requires "assessment of the design of new development to ensure that it provides a positive benefit in terms of landscape and townscape character, and enhances local distinctiveness.... to

protect, conserve and enhance the landscape character of the Borough”.

LPDMP Policy D4 (‘Achieving High Quality Design and Respecting Local Distinctiveness’) requires development proposals to demonstrate how the development would achieve the ten characteristics of well-designed places as set out in the National Design Guide and demonstrate a clear understanding of the place comprising the site and the surrounding context within which it sits including the opportunities for design as well as any constraints upon it.

The Council's Landscape Character Assessment identifies the townscape character area in which the application is situated as 'inter-war / post-war suburbs'. Key characteristics of the character area identified in the LCA include: street pattern is generally characterised by wide streets of crescents, avenues and cul de sacs; semi-detached properties and short red brick terraces are sometimes finished in pebble dash or white render; wide grass verges with mature trees are important landscape elements; front gardens and their boundaries (often clipped privet hedges) are an important part of the street scene; other landscape elements include small areas of woodland and native hedgerows which contribute to the ‘rural’ character of the area and provide a link between town and country;

The site is comprised of a corner plot, incorporating a two storey detached dwelling with single storey side additions and garden area, on the corner of Holford Road and Epsom Road. There is mature hedging running along the front and side boundaries of the site, including along the boundary frontage with Epsom Road.

The existing dwelling fronts on to and is accessed via Holford Road. This road is comprised of predominantly 1930 and 1950s style, two storey detached and semi-detached dwellings on spacious plots, with boundary vegetation to their side boundaries, and low level hedging or boundary walls to the front boundaries. Many of the dwellings along Holford Road incorporate distinctive white rendered elevations and all of the dwellings incorporate traditional pitched roofs. Holford Road slopes up from the start of the road (where the application site is located) southwards towards the end of the road which adjoins Merrow Downs. As a result of this sloping topography, the neighbouring dwelling to the south of the application site, 1 Holford Road, sits at a slightly higher ground level, and ridge heights of the adjacent dwellings step up following the natural topography of the road. The topography of the site being elevated slightly from Epsom Road, its corner position and the sloping topography of Holford Road, mean the site is

visually prominent.

To the east of the site, are two-storey Victorian dwellings which front onto Epsom Road. The pattern of development is of a tighter urban grain however, the character is still of two storey dwellings. The grain then becomes looser again as you travel further eastwards along Epsom Road.

To the opposite side of Holford Road, to the west, are two storey detached dwellings on spacious plots, set back from the road, with mature trees and vegetation to the boundaries. On the opposite side of Epsom Road (to the north) is a mature tree belt. The above characteristics provide a verdant and spacious character and context to the surroundings.

The application proposes the demolition of the existing two storey detached dwelling and the construction of a new three storey apartment building and the construction of a basement car park. The submitted drawings show that the basement level will extend across almost the full extent of the plot, including beneath the existing rear garden, with replacement landscaping proposed above.

The proposed building will front on to Holford Road. A proposed street scene drawing has been provided which appears to show the natural ground level of the site will be lowered from the existing to be level with the level of Epsom Road. This would lower the ridge level of the building in relation to the adjacent properties, however the ridge height would still be taller than that of the adjacent dwelling at 1 Holford Road, which sits at a higher ground level. The proposed lowering of the site levels would also result in a requirement for some form of retaining wall structure along the boundary with neighbouring property 1 Holford Road. However, no details have been provided with the application.

The proposed apartment building would have a significantly larger footprint compared to that of the existing detached dwelling, and will also provide accommodation at three storeys, across the entire footprint of the building. This is in contrast with the significantly more modest two storey scale of the adjacent dwellings. The proposed building would extend across almost the entire width of the plot and to over half the depth of the existing plot. Extending beyond the rear building line of the neighbouring property 1 Holford Road by approximately 7.5m (approx). The southern flank elevation of the building would also extend to within 1.5m (approx) of the boundary with 1 Holford Road, at the full 3 storey height. This

is compared to the existing dwelling which has a separation distance to the boundary above the ground floor level of 4.5m (approx), with only an existing flat roof single storey garage currently adjoining the boundary with 1 Holford Road. This provides a visual gap between the buildings, in keeping with the existing spacing between properties which is characteristic along Holford Road.

The proposal for such a tall and deep flank elevation, in such close proximity to the boundary with 1 Holford Road, would not be keeping with the context and character of the street scene along Holford Road. The adverse impact on the street scene would be exacerbated by the height, mass, design and proportions and detailing of the proposed building. In particular, the provision of a wide vehicular access leading to a wide stark opening at ground floor level, immediately adjacent to the boundary with 1 Holford Road, would appear as a stark and incongruous feature in the street scene. The proposed substantial level of excavation required so close to the boundary is also likely to adversely impact on the existing boundary hedging. No detail has been provided to demonstrate how the change in levels would be addressed or how replacement planting could be provided and maintained along this boundary, further exacerbating the adverse impact on the street scene.

The proportions, detailing, gable ends and three storey appearance proposed to the front of the building do not reflect, or appear sympathetic to, the style, character and proportions of the adjacent properties in Holford Road. This together with the limited spacing to the southern boundary with 1 Holford Road, would result in an incongruous and overly dominant building, that would harm the character of the existing street scene in Holford Road.

The proposed building would also extend significantly closer to Epsom Road compared to the existing dwelling, which has its two storey flank elevation set back from Epsom Road by 10.5m (approx). In comparison, there would be a much reduced separation distance of approximately 3m (at the nearest point) between the northern flank elevation of the proposed building and the northern boundary of the site with Epsom Road.

The northern flank elevation of the building would front Epsom Road and as noted above would extend much closer towards Epsom Road than the existing dwelling. The proposal due to its substantial depth, will incorporate a large area of flat roof which would exacerbate the bulk and massing of the building when viewed from

Epsom Road.

Whilst the elevation would be stepped in slightly from the boundary further towards the rear of the building, the flank elevation would incorporate large sections of blank brick wall resulting in a stark unrelieved elevation in parts, which would not provide an attractive frontage to Epsom Road. Large flat roof dormer windows are also proposed on the northern flank elevation and rear elevation which would be prominent and visible from Epsom Road. There are no existing dormer windows, at second floor level, facing towards Epsom Road in this part of the street scene and the design and proportions of the building would not relate in a sympathetic manner to the adjacent modest scale, pitched roofed, two storey dwellings immediately to the east of the site.

In addition, much of the front of the site will be taken up with hardstanding for the vehicular access ramp, together with a proposed bin store and steps down to the basement car park. This will leave very limited space for soft landscaping to the front of the site. There is also concern regarding how successful any new planting would be due to the extent of the proposed basement beneath the site. No detail has been provided to demonstrate how the existing boundary planting would be retained and protected or how new planting would be achieved and maintained.

It is considered that the overall scale, bulk, massing, height, poor design and proportions of the proposed building, incorporating large areas of flat roof, together with its prominent corner position, would result in a development which appears overly prominent, incongruous and overbearing within the street scene within both Holford Road and Epsom Road and would adversely impact on the context and character of the surroundings.

Furthermore, the extent of the proposed basement and the scale of excavation required has the potential to adversely impact on existing boundary vegetation including a Category B Sycamore tree which sits adjacent to the north eastern boundary (outside of the site). No detail has been provided to demonstrate that existing trees and hedging could be retained or whether replacement or additional planting and soft landscaping could successfully become established following the level of excavation proposed for the basement car park. There is significant concern that an appropriate and sympathetic landscaping scheme would not be achievable, which would further exacerbate the adverse impact of the proposal on the verdant character of the surroundings.

It is therefore concluded that the proposal fails to accord with the requirements set out in Para 130(a to d) of the NPPF, or Policy D1 of the LPSS and Policy D4 of the LPDMP.

Impact on neighbouring amenity

Paragraph 130(f) of the NPPF requires 'places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users'. These principles are carried through in policy D5 of the LPDMP.

162 Epsom Road

This is the neighbouring property to the east of the application site. This neighbouring dwelling is a semi-detached two storey dwelling which fronts on to Epsom Road. The western side boundary of the property forms the rear boundary of the application site. Towards the rear of the property there is an existing electricity substation which sits between part of the boundary of 162 Epsom Road and the application site. However, for the remainder of this boundary, the application site immediately adjoins the boundary with 162 Epsom Road. The boundary treatment consists of 1.8m high closeboard fencing and hedging.

This neighbouring property has windows on its western flank elevation facing towards the application site which include a dining room and kitchen window at ground floor level and landing and bedroom window at first floor level.

As existing, the rear elevation of the existing dwelling on the application site contains two windows at first floor level. The existing separation distance between the two storey rear elevation and the flank elevation of 162 Epsom Road is approximately 23.5 metres (based on aerial mapping).

As noted above, the proposed apartment building will extend significantly further into the plot than the existing dwelling, resulting in a the separation distance between the rear elevation of the proposed building and the shared boundary being reduced to approximately 13 metres (based on the submitted site layout plan) and 17 metres (approx) to the flank elevation of 162 Epsom Road. In addition to this reduced separation, the proposed building will be substantially taller than

the existing dwelling and will have several windows at first and second floor level facing directly towards the flank elevation of 162 Epsom Road.

The rear elevation of the proposed building includes three windows at first floor level, two serving living rooms and one serving a kitchen / dining room. At second floor level, two dormer windows are proposed on the rear elevation, one serving a bedroom and one serving a living room.

It is considered that the separation distance between the proposed building and the neighbouring property at 162 Epsom Road would be sufficient to ensure that there would not be a detrimental loss of light or overbearing impact to the neighbouring property. However, as a result of the limited distance between the rear elevation of the proposed apartment building and the boundary with 162 Epsom Road, together with the number and type of windows proposed in the rear elevation, at first and second floor level, it is considered that the proposal will appear overly intrusive and oppressive impact and will result in a detrimental level of overlooking towards the ground and first floor windows on the western flank elevation of 162 Epsom Road and will subsequently result in an unacceptable loss of privacy to the occupants of this neighbouring property. The proposal is therefore contrary to Policy D5 of the LPDMP and Para 130(f) of the NPPF.

1 Holford Road

This neighbouring property immediately adjoins the application site to the south. As noted above, due to the sloping topography it currently sits at a slightly higher ground level. The shared boundary between 1 Holford Road and the application site consists of 1.8m (approx) high closeboard fencing and mature hedging.

Concerns regarding the amount of excavation proposed are noted above in relation to the scale and character considerations but are not considered to affect neighbouring amenity considerations specifically. Issues regarding structural stability are separate to planning. Notwithstanding this, there are concerns regarding the impact of the proposed development on the amenities currently enjoyed by the occupants of 1 Holford Road.

On the application site, there is currently a single storey flat roof garage structure adjoining the boundary with 1 Holford Road. A first floor level, there is an existing separation distance of 4.2m (approx.) between the southern flank elevation of the

existing dwelling on the application site and the shared boundary. In contrast, the proposed apartment building is to be positioned at a separation distance of approximately 1.5 metres from the shared boundary.

It then extend to a depth of 11.6m (approx) at this distance, before being stepped away from the boundary slightly, increasing the separation distance to 3.5 metres (approx), for a further depth of 4.3m. In total, the building will extend beyond the rear elevation of 1 Holford Road by approximately 7.7m, with a ridge height of approximately 10m, within 1.5 to 3.5 m of the shared boundary. This would introduce a large extent of predominantly blank brick wall which would be readily visible from the rear windows and primary outdoor amenity space to the rear of 1 Holford Road.

Again, as noted above, no details of proposed site levels have been provided. Comparative ridge heights are shown on the submitted street scene drawing. However, there is concern regarding the accuracy of the street scene drawing, without the provision of a site levels plan. Notwithstanding this, based on the levels shown on this street scene drawing, the ridge level of the proposed building would be slightly taller than that of the existing dwelling at 1 Holford Road. The proposed building would encroach within a 45 degree angle taken from the nearest first floor rear windows at 1 Holford Road. Whilst it is noted that the proposed development would be located to the north of 1 Holford Road and therefore would not impact on sunlight, it is considered that due to the scale, bulk and height of the proposed building, its projection beyond the rear elevation of 1 Holford Road and its proximity to the boundary for a significant depth, together with the stark design of the flank elevation and bulky roof design, the proposal would have an unacceptable overbearing impact on the windows and rear garden area of this neighbouring property. The proposal is therefore contrary to Policy D5 of the LPDMP in this regard.

On the southern flank elevation of the proposed building, there is only a single bathroom window and high level rooflights proposed facing towards 1 Holford Road. These could be conditioned to be obscurely glazed and high level where applicable. As a result, it is considered that the proposal would not result in a detrimental loss of privacy to the rear garden or windows at 1 Holford Road.

Other neighbouring properties

It is considered that there would be sufficient separation distance to properties on the opposite side of Holford Road to ensure that there would not be unacceptable impact on the amenities enjoyed by the occupants of these properties.

Amenity of future occupiers

Policies H1 and D1 of the LPSS requires that all new developments are expected to have regard to and perform positively against the recommendations set out in the latest Building for Life guidance and conform to the nationally described space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG).

The proposed new units would have overall floor areas which would exceed the minimum requirements of the nationally described space standards.

Policy D5 of the LPDMP requires all new building residential development proposals, including flatted development, are expected to have direct access to an area of private outdoor amenity space. The proposal includes the provision of a communal amenity space to the rear of the proposed building. However, only one flat would have direct access to this space and it would not constitute private amenity space.

There is no provision for any balconies or any other form of private outdoor amenity space any of the proposed 7 flats. As such, the proposal does not accord with the requirements of Policy D5 of the LPDMP.

Due to the lack of provision for any outdoor private amenity space for the occupants of the proposed development, it is concluded that the development proposed would result in a poor standard of amenity for future occupiers of the development and the proposal does not comply with the objectives of policy H1 and D1 of the LPSS, D5 of the LPDMP and Para 130(f) of the NPPF.

Highway/Parking Considerations

The proposed development has been considered by the CHA who has assessed the application on safety, capacity and policy grounds. Whilst it is not considered that

the proposed development will result in a significant increase in vehicular trips on the surrounding highway network, the CHA recommends the proposal be refused on the grounds that it has not been demonstrated to the satisfaction of the CHA that safe and suitable access can be gained to/from the proposed development. Therefore, the proposal is contrary to the LPSS Policy ID3 and the National Planning Policy Framework. The CHA has advised that the proposed access ramp to/from the car parking area is at a gradient of 1:6. This gradient is deemed too steep and is not suitable for safe access to/from the parking area.

Access and Car Parking

Vehicular access into the site would be gained from Holford Road (as per the existing situation) and would lead to the proposed underground car park.

The submitted plans shows that visibility splays of 2.4 metres x 43 metres can be achieved to the south on Holford Road, and 2.4 metres x 25.8m and 33.6m, respectively can be achieved to the cars approaching the Holford Road junction to the north. Pedestrian visibility splays of 2.0 metres x 2.0 metres can also be achieved on both sides of the access. The CHA considers that the proposed visibility splays are acceptable.

With regard to parking provision, the site is within a suburban location. The Council has a recently adopted Parking Standards for New Developments SPD. Policy ID10 of the LPDMP also states that the provision of car parking in new residential development will have regard to the expected standards set out in the Parking Standards for New Development SPD.

Table A.2 within the SPD sets out that in suburban areas the expected level of provision is 1 spaces per 2 bedroom flat. There is also a requirement for 2 visitor parking spaces. The total requirement for the proposed development is therefore 9 parking spaces. The application shows the provision of 11 proposed parking spaces within a basement car park. Whilst the provision of 11 spaces for the 7 x 2 bedroom apartments proposed would exceed the Council's adopted parking standards, it is considered that additional information is required in order to demonstrate that access to the basement parking would be achievable and that there would be sufficient space for turning and manoeuvring within the basement level, to ensure cars would be able access all of the space and leave the car park in forward gear.

The CHA has noted that some tracking details have been provided with the submitted Transport Note, however the tracking shown appears tight. In addition, cross-section drawings have been provided during the course of the application which show the gradient of the access ramp as 1:6. The CHA has advised that this is too steep and is not suitable for safe access to / from the parking area. For this reason, the application is contrary to Policy ID3 of the LPSS.

In addition, without a satisfactory access to the proposed basement car park, the Council cannot be satisfied that there would be adequate parking provision for the proposed development. Without adequate accessible parking provision, the proposal would result in a significant level of overspill parking on the adjacent highway. It is noted that the site is within a sustainable location. Due to the location of the site, in close proximity to the junction with Epsom Road which is an 'A' road and limitations on on street parking within Holford Road, due to numerous vehicle crossovers serving private driveways, it is not considered that it would be acceptable to rely on on-street parking to accommodate overspill parking. It is therefore concluded that the proposal, due to insufficient information regarding the proposed parking and ramped access layout, would not accord with the Council's Parking for New Developments SPD and Policy ID10 of the LPDMP 2023.

Cycle storage

The proposal includes the provision of secure cycle storage within the proposed basement car park.

Refuse provision

A bin store and collection point is proposed to the front of the site, in close proximity to the highway. The Council's Operational Services Team has confirmed that the proposed arrangements for refuse storage and collection, as shown on the submitted refuse strategy plan, are acceptable.

Impact on protected species / biodiversity

LPSS Policy ID4 sets out the Council will seek to maintain, conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, while

new development should aim to deliver gains in biodiversity where appropriate.

Policy P6 of the LPDMP relates to 'Protecting Important Habitats and Species' and Policy P7 of the LPDMP relates to 'Biodiversity in New Developments'.

Surrey Wildlife Trust (SWT) has been consulted on the application and has advised that the submitted ecology reports appear appropriate in scope and methodology and have identified the likely absence of active bat roosts within the development site. SWT therefore advise that bats do not appear to present a constraint to the proposed development. However, bats are highly mobile and move roost sites frequently. Unidentified bat roosts may still present. A precautionary approach to works should therefore be implemented.

Conditions requiring the submission of a Sensitive Lighting Management Plan and Landscape and Ecological Management Plan (LEMP) would have been recommended if other matters of the application were considered acceptable.

In accordance with the NPPF and Policy ID4 of the LPSS, there is a requirement for proposed development to achieve a net gain in biodiversity and Policy P7 (1) of the recently adopted Local Plan Development Management Policies (LPDMP) requires maximum net gain.

A Biodiversity Net Gain Assessment (by Ecosupport, received 4th August 2023). SWT has advised that the submitted BNG assessment report indicates that the proposed development can achieve a biodiversity net gain of 97.03% habitat area units and 61.02% hedgerow units. Whilst the hedgerow units do appear to be realistic and achievable, SWT has the following queries and concerns regarding the habitat area unit calculations:

- comment on this application indicates that tree(s) on site may have recently been felled; given this comment it is not clear how the baseline of the site has been assessed.
- it is not clear how realistic the proposed urban tree planting is given this may be above an underground car park, the extent of which is not clear within the above referenced report.
- the baseline of the non-buildings and hardstanding areas was assessed to be

‘vegetated garden’. Post development the non-building and hard standing area is proposed to be ‘modified grassland’ in moderate condition; it is not clear whether this habitat is realistically achievable. If this post development habitat is set to ‘vegetated garden’, the proposed development would result in a small biodiversity net loss.

There is particular concern regarding the proposed extent of the underground car park and how or whether replacement planting could be provided successfully above the proposed construction area in order to achieve a net gain. From the information submitted, the Local Planning Authority cannot be satisfied that the proposed development would achieve a net gain in biodiversity or that there would not be a net loss in biodiversity. The proposal is therefore contrary to Policy ID4 of the LPSS and Policy P7 of the LPDMP.

Impact on trees and vegetation

An Arboricultural Survey has been submitted. However, an Arboricultural Method Statement or Tree Protection Plan have not been provided.

As noted above, a significant amount of excavation is proposed in close proximity to all of the boundaries of the site. There is an existing Category B Sycamore Tree which sits outside of the site but is very close to its north eastern boundary, along Epsom Road. The Council's Tree Officer objects to the proposal due to concerns regarding the impact of the proposed excavation works on this tree which is on third party land.

It is concluded that the proposed development would result in a significant amount of ground excavation in close proximity to a Category B Sycamore tree which lies adjacent to the site as well as existing mature hedging on the site boundaries. The existing tree and hedging make a positive contribution to the visual amenity of the area. Insufficient information has been provided to demonstrate that the proposal would not have an adverse impact on the health of the tree and hedging or subsequently the contribution to visual amenity they provide. The proposal is therefore contrary to Policy D4 and P6 of the LPDMP.

Sustainability

The NPPF emphasises the need to support the transition to a low carbon future in a changing climate and new developments are required to meet the requirements of paragraph 154 through suitable adaptation measures, including through the planning of green infrastructure and reduce greenhouse gas emissions. Paragraph 157 then states new development should comply with local requirements for decentralised energy supply and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Policy D2 of the LPSS requires new development to take sustainable design and construction principles into account, including by adapting to climate change, and reducing carbon emissions and Policies D2(3) and (11) requires sustainability and energy statements to be submitted. The Council has adopted the Climate Change, Sustainable Design, Construction and Energy SPD in December 2020.

Policies D14, D15 and D16 of the LPDMP carry full weight and build on policy D2. In the context of the Council declaring a climate emergency in July 2019 and the UK having a legally binding target of reducing all greenhouse gas emissions to net zero by 2050 with an interim target of 78% reduction against 1990 levels by 2035.

Following adoption of the LPDMP D16: Carbon Emissions from Buildings (1), (2), (3), (4), would supersede D2: Climate Change, Sustainable Design, Construction and Energy (5), (6), (7), (9).

A fabric first approach is required under Policy D14(1) in accordance with the energy hierarchy. Through the use of low energy design and energy efficient fabric. Then Policy D2(1), (5), (9) of the LPSS and Policy D16 of the LPDMP require measures for low and zero carbon and decentralised energy.

With regard to sustainable design and lifestyles Policy D2(1)(c), (e) of the LPSS seeks to ensure that there are sustainability measures to offer choices.

The application includes a Sustainability Statement and Energy Statement (by Base Energy). These documents set out the following sustainability measures to be incorporated in the proposed development:

CARBON EMISSIONS

- The ES statement notes the scheme will achieve a reduction of 51% against 2021 Building Regulations Part L.
- This reduction was for Flat 1 GF, SAP output documents for each flat or flat type will be needed. These could be provided at the planning conditions stage.

ENERGY HIERARCHY

- Overall, it looks as though the energy hierarchy has been followed although while the fabric values are better than Part L 2021 limiting values they are not exceptional. The carbon reduction achieved through fabric (measured through TFEE/DFEE) is only 1.99%.
- There is a point of inconsistency in the submitted ES. From the information in the ES (and the SAP output document of Flat 1 GF) it appears as though the development is gas free, however, the DAS states “fit out will include high efficiency gas boilers” which is inconsistent with this and with the energy hierarchy. This needs to be clarified. If the development is gas free then this could be conditioned and if not then the proposal is not in accordance with the energy hierarchy and therefore contrary to Policy D2 2 of the LPSS.

LOW AND ZERO CARBON ENERGY

- ASHPs are selected for hot water heating and PV panels will be provided on the roof.

WASTE AND RESOURCES

- Recycled aggregates will be used where possible. There is commitment to a Site Waste Management Plan, adherence to the waste hierarchy and BRE Smartwaste tool are proposed to be used.
- Timber will be FSC certified.
- Applicant has stated materials with a high BRE Green Guide rating will be used.

SUSTAINABLE DESIGN

- Site constrained regarding layout, but consideration has been given to overheating and the use of PV panels.
- Cycle storage and EV charging will be provided in accordance with policy requirements.
- Potentially rainwater harvesting for gardening. Space to facilitate recycling and composting will be provided. These measures could be conditioned.

WATER EFFICIENCY

- Both rainwater harvesting and a digital water meter could be provided, but both are dependent on the final detailed design. Rainwater harvesting could be

conditioned.

- Commitment to the 110 standard is provided and would need to be conditioned.

CLIMATE CHANGE ADAPTATION

- Consideration of overheating has been carried out. A condition requiring submission of an overheating assessment (CIBSE TM59 or equivalently robust assessment) that shows the proposed units will not have an unacceptable risk of overheating would be required.
- Landscaping will be heat and drought resistant.
- the application states the site has a high risk of surface flooding, measures to mitigate will be taken after further consultation.

As such, it is considered that the proposed development would comply with policy D2 of the LPSS and Policies D14, D15 and D16 of the LPDMP.

Flooding and land drainage

The application site is within Flood Zone 1 (Low Probability). This zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1 per cent). Paragraph 100 of the NPPF states that development be directed away from area at the highest risk. The proposal is therefore an acceptable location for new residential development in line with the aim of the NPPF.

A drainage strategy has been submitted with the application and the LLFA has advised that this appears acceptable subject to further information being provided regarding how the basement will be drained and how surface water runoff will be mitigated. A detailed plan illustrating how surface water will be dealt with in the basement / car parking area could be secured by condition.

Thames Basin Heath Special Protection Area (TBHSPA) and Appropriate Assessment (AA)

The proposed development may adversely impact the TBHSPA due to the net increase in residential units at the site. The Council's adopted TBHSPA Avoidance Strategy 2017 requires a SANG contribution and an Access Management (SAMM) contribution to avoid any adverse impact in line with the tariff within the annual updating of off-site contributions document.

Without the completion of a legal agreement the development would impact on the TBHSPA and would not meet the objectives of the TBHSPA Avoidance Strategy 2017 and Policy NRM6 of the South East Plan 2009. For the same reasons the development does not meet the requirements of Regulation 61 of the Conservation of Habitats and Species Regulations 2010.

Furthermore, because the application is not being recommended for approval it is not considered necessary to carry out an appropriate assessment.

Legal agreement requirements

The three tests as set out in Regulation 122 require S106 agreements to be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

As the application would result in the net gain of 6 new residential units, in order for the development to be acceptable in planning terms, a S106 agreement is required as part of any subsequent planning approval to secure a financial contribution towards a SANG and SAMM, in line with the Guildford Borough Council TBHSPA Avoidance Strategy 2017. This strategy has been formally adopted by the Council. In line with this strategy and the requirements of Regulation 63 of the Habitats Regulations 2017, a S106 agreement is required to ensure that the additional residential units proposed by this development would not have any likely significant effect on the TBHSPA.

In conclusion, if the application was deemed to be acceptable, the Council is of the opinion that the legal agreement would meet the three tests set out above.

Conclusion

There is no objection to the principle of the development and the proposal would deliver a net increase of seven new homes in a sustainable location.

However, there are several significant concerns regarding the application,

including: the impact on the context and character of the area, impact on neighbouring amenity, proposed housing mix, impact on trees and vegetation, standard of amenity for future occupants, impact on biodiversity, highway safety, parking provision and the impact on the Thames Basin Heath SPA.

The application is therefore recommended for refusal.