



BURPHAM COMMUNITY ASSOCIATION

Annual Report May 2020



Chairman's Statement

I would like to start by expressing, on behalf of the BCA, sympathy for anyone who has suffered loss, illness or hardship during the coronavirus outbreak and associated lockdown. Writing this in May 2020, it is inevitable that this topic dominates our thinking. I am proud of the efforts of all those who have contributed to the Burpham Support Team and attempted to alleviate the harm done in Burpham.

Over the past year, a significant amount of effort has also gone into the more usual BCA activities, including many planning, development and infrastructure matters which have the potential to affect the quality of life in Burpham for the long term. I have no doubt that the BCA will continue to do its best for the community, but I will remind you that the committee is a small group of volunteers. We often find ourselves too stretched to do all that we would like to. If more people could spare the time to help, we could achieve even more to the benefit of everyone in Burpham.

Andy Clapham June 2020

Burpham Community Care

The BCA realised that local help would be needed and sent out a bulletin to members, which prompted Burpham Church to contact our Membership Secretary, Liz Turner. This led to a joint venture with the Church, the BCA and Mead Way Neighbourhood Watch to start Burpham Community Support. A postcard was put through every door in the village giving details of how people could get help, and also asking for volunteers. Some 200 people stepped forward to offer help with all kinds of tasks – shopping, collecting prescriptions, dog walking, and telephone support.

There have been requests for help from almost 100 households – some with a one-off requirement for shopping while waiting for the elusive supermarket delivery slot, and some weekly requests for shopping or prescription collections. Two unexpected outcomes saw two old friends put in touch and a call from East Anglia to see if an aunt could be helped.

We have been sharing ideas with other Residents' Associations, particularly Merrow, and also received assistance from Voluntary Action South West Surrey. It has been really heartening to see so many local businesses adapting to the situation and offering help to the community. Please do not assume only large supermarkets deliver – there is a list of local suppliers on our website.

This has been a remarkable response and a great deal of hard work has been put in by the team so a huge thank you to Liz, and Anne, Gracie, Lisa and Marcelle from the church, and all the volunteers who have made this possible. It has not always been an easy task, especially in the early days. This photo gives an idea of the length of the Sainsbury's queue – taken by a volunteer shopper who noted it took about half an hour to get through the doors!



It is likely that people will continue to need assistance for some time so do please keep an eye on neighbours – especially the elderly, the single parent, people on their own and households self-isolating.

Planning and Infrastructure

Local Plan

The Local Plan was adopted in April last year. At the beginning of this year, GBC published a further consultation document, the Draft Strategic Development Framework (SDF), Supplementary Planning Document (SPD). This outlined plans for the development of the five strategic sites which include Gosden Hill. The BCA's response focussed on the appalling proposals for routing traffic through Burpham that can only exacerbate existing problems. It is clear that our robust responses to the two Draft Local Plan consultations fell on deaf ears, as the serious issues we raised have either been ignored or glossed over.

The map below shows the proposed Highways and Public Transport framework which, if implemented, would turn Burpham into a giant roundabout. The Sustainable Movement Corridor along the A3100 envisages two bus lanes, and two cycle paths in addition to the existing traffic routes. The fact that this would require the demolition of many private dwellings, Aldi, the BP garage and the car show room seems to have gone unnoticed. A very major concern is the proposed two-way on/off A3 southbound access. When the proposal to build on Gosden Hill was first put forward in 1984, a multi-way junction was considered essential. Given the increase in traffic since then, we would consider it even more essential.

The map on page 3 shows the details of the development

You can read the full BCA response to the SDF/SPD at the end of this report.

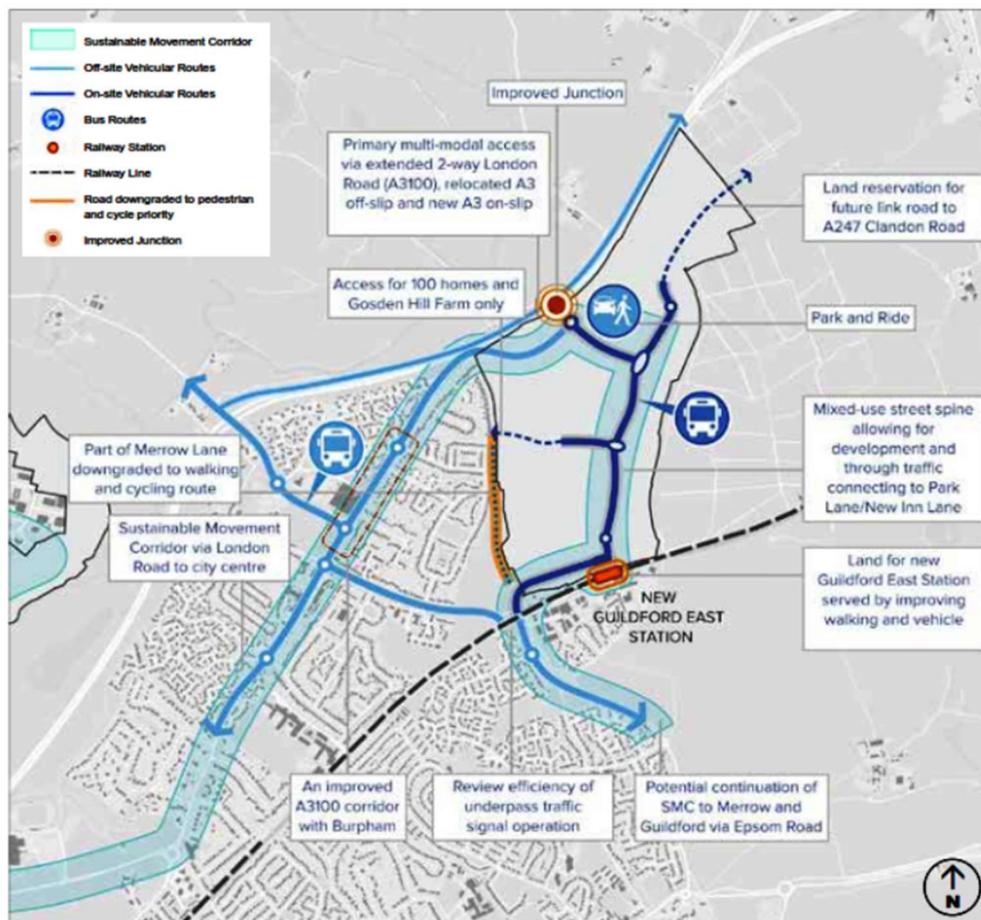
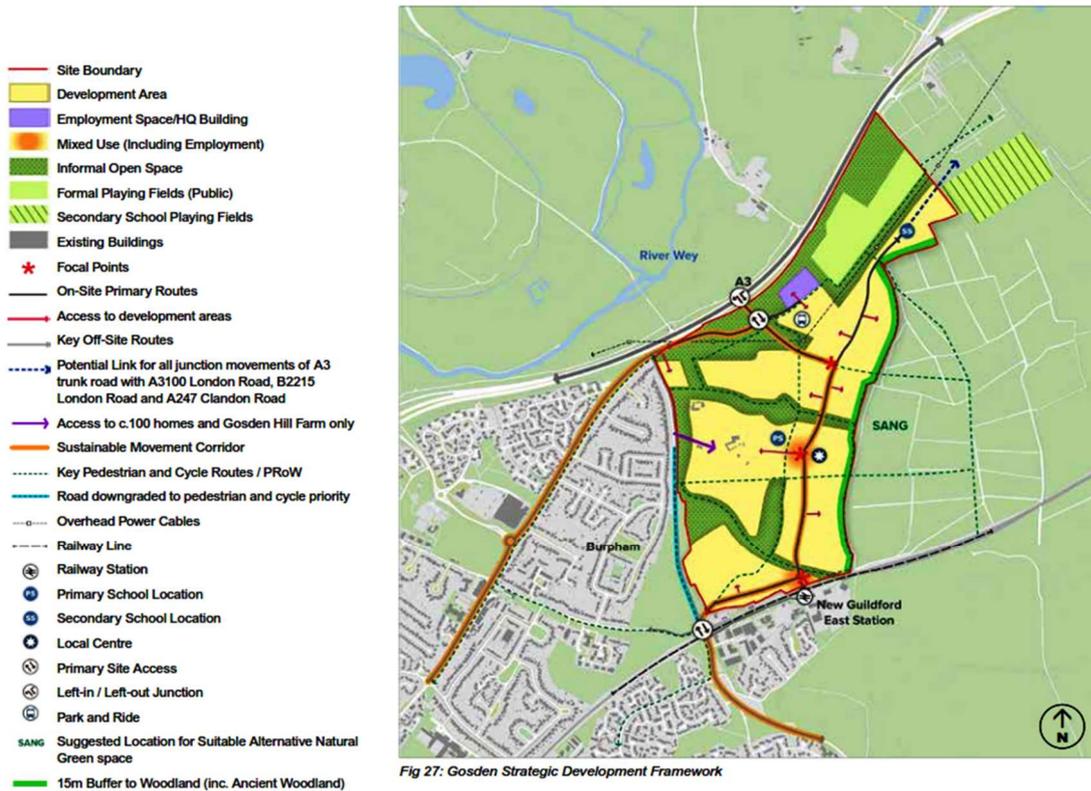


Fig 29: Gosden Hill Highways and Public Transport Framework



Planning Applications

The BCA and the Burpham Neighbourhood Forum (BNF) monitor all planning applications in the Ward but the BCA does not normally comment on individual applications for single properties unless the wider neighbourhood is likely to be affected.

Marlyn’s Cottage



An application to demolish Marlyn’s Cottage and replace it with a three storey block of apartments generated 54 objections, including the BCA and the BNF. The application was refused by GBC but the appellant appealed against the decision. The Planning Inspector published his findings in April this year and we are delighted that he refused the appeal.

You can read his detailed report here at the end of this report but the main issues he raised were:

- The effect the development would have on the character and appearance of the area
- Provision of adequate off-road parking.

In both cases the Inspector made reference to policies in the BNF Neighbourhood Plan.

Burchatt's Farm

The proposal to change the use from assembly and leisure was refused by GBC on the grounds that a community asset would become something that only a small part of the community would use; they also had concerns that the proposed partitions could harm the heritage asset of the Grade II listed building. The appellant appealed and this was upheld by the Planning Inspectorate.

In April this year it was announced that the building had been leased to the Guildford Chiropractic Centre. Councillor Redpath (R4GV) noted that “the barn will be released in 10 years’ time when there will be an opportunity for it to return to community use.” (as reported in the Guildford Dragon April 9th this year) It was also announced that GBC had appointed consultants to examine the complete decision making process.



Infrastructure

This continues to be of considerable concern as current deficiencies will be exacerbated by the proposed development at Gosden Hill. As we noted in our response to the Supplementary Planning Document –

There is a reference to “the long term development of sustainable urban communities and associated infrastructure.” This document fails to acknowledge serious current shortfalls in infrastructure which will need to be addressed before any new development. The word mitigation appears frequently in the Local Plan which merely means to make less severe. We would encourage the use of solution – a means of solving a problem.

Two years ago we reported on the serious blockage of the Burpham and Merrow sewer at Bowers Lane in August 2017. Last year we observed that, despite the detailed report compiled jointly by the BNF and the BCA, no action had been taken to prevent a recurrence.

However, we are pleased to note from a newspaper report that some 700 blockages within the Guildford Sewage system have been found and cleared over the last year or so. At the time of the 2017 blockage we were informed that the sewers were “self-cleaning,” so clearly on those grounds we can claim no credit for the removal of the other 700 blockages in the “self-cleaning” sewers. On the other hand, the BNF/BCA report might just have prompted the action taken by the Thames Water contractor who actually found and removed those blockages.

Merrow Lane Gates

We reported last year on the combined efforts of the BCA and Merrow Residents’ Association to get the gates that link Gosden Hill farm to Merrow Lane removed as there is documentary evidence that they are illegal. We were told that the authorities were considering the issue.

The authorities are still considering the issue.

West Clandon Draft Local Neighbourhood Plan

This was put out for consultation in February this year. Much of the content was specific to Clandon but we did comment on issues that affected Burpham, notably the traffic problems that will result from the Gosden Hill farm development. Such problems cannot be resolved by taking action that will cause difficulties elsewhere and we have suggested that the best way forward would be to have tripartite discussions with Merrow and West Clandon. These will have to be held in abeyance during the current situation.

Flood Forum

Background

GBC commissioned a Surface Water Management survey in 2012 which identified Burpham as a flooding hotspot. During the winter of 2013/2014 there was serious flooding in Burpham and the BCA set up a Flood Action Group which led to the establishment of the Burpham Flood Forum.

The Forum meets annually and is made up of representatives from SCC, GBC, the Environment Agency, Thames Water and the National Trust. This has, up to now, been chaired by Anne Milton; we would like to extend our thanks to her and her Constituency staff for all the help they have given over the last few years. Our new MP, Angela Richardson, has agreed to take over the chair at future meetings.

Current situation

Over the past year, members of the Flood Action Group, in particular Tony Mallard and Tony Teal, have been busy maintaining e-mail contact with the five agencies involved, not an easy task given that each agency's responsibilities overlap, which can lead to lengthy discussion as to who is actually responsible for what. We were pleased to note that action was taken by GBC during the winter rains when staff cleared the Merrow Lane grill, and that the Environment Agency have monitored the grill at London Road. This ensured that water level was kept at a manageable level.

The BCA would like to thank all the members of the Forum for their efforts, in particular Tony Teal as convenor of the Flood Action Group and John Beard who has drawn up and updates the very detailed Action Plan that acts as a guide for Forum meetings. Thanks are also due to Jim Allen for all the work he has been doing in connection with erosion and other problems on the River Wey. Follow the link for his recent virtual walk along the river – just peaceful scenery and birdsong. <https://youtu.be/l-UxWJUqrtg>



Burpham Road Action Group (BRAG)

Background

Road and traffic problems are endemic in Burpham and headed the list of concerns raised when the BCA carried out a survey a few years ago. The proposal to build the Clay Lane link road from Slyfield - across the flood plain – caused great concern and the action group grew from that. These issues were compounded by the publication of the Draft Local Plan which, if implemented, would cause even greater problems.

Terms of reference and a schedule of road and traffic issues were drawn up. The hope was that we could form a group similar to the Flood Forum, a semi-autonomous group with its own convenor and note taker; this has not yet been possible. We do need more people to come forward – ideally representatives from a road or group of roads so that the whole village is involved. If you would like to help, please contact the Secretary at secretary@burphamca.org.uk

Meetings and Social Events

We usually hold public meetings every two months. The speaker at last year's AGM was Councillor George Potter, newly elected Burpham Ward Councillor. He and his colleague, Councillor Ted Mayne, outlined their priorities for the next few years. July saw a Summer Social, a cheese and wine party which kicked off with a quiz. Martin Giles, editor of the online newspaper, the Guildford Dragon, gave a talk in October and the year ended with a Christmas Social.

In January 2020, the Guildford Environment Forum gave a presentation on Climate Change. Angela Richardson, Guildford's newly elected MP, was due to speak in March but the meeting had to be cancelled due to Covid-19 restrictions. She has agreed to speak at a future meeting.

The AGM has been cancelled for the same reasons. The Committee agreed that the Annual Report and Financial Report would be prepared as usual and emailed to members, and that all present committee members would remain in post until we can hold a public AGM.

It is unlikely that we shall be able to hold any public gatherings in the near future

General

Meetings with Councillors

Members of the BCA committee and our Ward Councillors, George Potter and Ted Mayne, have had three meetings to date, during which the following items have been discussed.

- The closure of New Inn Surgery. This caused distress to many residents and a great effort was made by the doctors, patients, the BCA, the BNF and our councillors to try and prevent it.
- Sutherland Memorial Car Park charges.
- Gosden Hill Farm and Garlick's Arch proposed developments. Although Garlick's Arch is outside Burpham Ward, the 500 home development has implications for Burpham's transport infrastructure.

A further meeting had been scheduled for April but has had to be postponed. We would like to thank our councillors for their efforts on Burpham's behalf.

Traveller incursions

There have been two incursions in New Inn Lane this year, the last at the end of April. A huge amount of tree waste was accumulated which had to be removed by two large tipper trucks. Concrete blocks have been placed to prevent further incursions



– we hope these will eventually be replaced with a ditch and bund. Our thanks to residents who alerted the authorities, especially Graham Hardy, and to our Ward Councillors and SCC officials who dealt very efficiently with the problem.



Photographs from Graham Hardy

Links with other organisations

We work closely with the BNF and also with Merrow Residents' Association. We maintain links with other neighbouring RAs and Parish Councils – Jacobs Well, Sutton Green, Worplesdon and West Clandon. The BCA is a member of the Guildford Residents' Association and subscribes to the Campaign to Protect Rural England and the Open Spaces Society which campaigns to protect common land and green spaces.

Pollution Workshop Follow Up

In January 2019, Professor Kumar and his team from the Global Centre for Clean Air Research, University of Surrey, gave a workshop for BCA members on ways of dealing with air pollution. They also carried out air quality monitoring in Burpham.

The team have produced a booklet aimed at schools and local communities which was released at the end of May. The BCA, along with many other groups, has been acknowledged as a supporter

Guildford Lottery

Members can now support the BCA by buying tickets for the lottery. Each £1 ticket gives us 50p.

The amount raised for the last year is just over £1,000 and there have been over 50 local winners – thank you to everyone who has bought tickets.

L.C. June 2020



BURPHAM COMMUNITY ASSOCIATION

276 London Road
Burpham
Guildford
Surrey GU4 7LF

21st February 2020

Planning Policy,
Guildford Borough Council
Millmead House,
Millmead,
Guildford,
Surrey, GU2 4BB.

Dear Sir/Madam,

Response to Strategic Development Framework SPD Consultation February 2020

I write on behalf of the Burpham Community Association. We appreciate the opportunity to respond to the plan for the five Strategic Sites with particular reference to Gosden Hill.

Foreword

The foreword refers to 9,000 dwellings to be built on Green Belt and Green Field sites but the Local Plan indicates that land for 14,500 has been allocated. We are concerned that the strategic sites are being looked at in isolation and therefore the overall impact of these developments on the Borough will not be considered.

Part 1 Background and Context

Paragraph 1.1.2

There is a reference to “the long term development of sustainable urban communities and associated infrastructure.” This document fails to acknowledge serious current shortfalls in infrastructure which will need to be addressed before any new development. The word mitigation appears frequently in the Local Plan which merely means to make less severe. We would encourage the use of solution – a means of solving a problem.

Paragraph 1.2

We note that this document makes no reference to the Burpham Neighbourhood Plan or to other existing or future Neighbourhood Plans. This should be remedied.

Community Engagement

We note that the three technical stakeholder workshops were the first to be held. Two of them had “discussing local perceptions and opinions” on their agendas. This raises intriguing questions:

Were the outcomes of the workshops involving community representatives and Residents' Associations either known in advance or considered irrelevant?

Were the discussions based on the technical stakeholders' perceptions and opinions of our perceptions and opinions, or those of the developers?

Paragraph 2.2.9

The purpose of the Residents Associations' workshop included to 'Understand the nature of the infrastructure and facilities required....' In relation to Gosden Hill, two of the most important points made were

- a) the unsuitability of Merrow Lane for construction traffic or extra volume of traffic from the new development and
- b) the clear need for a 4-way junction with the A3, avoiding the need for construction traffic or GH residents to routinely go through Burpham or Merrow for most journeys.

While we understand that consultation enables views to be considered and not necessarily adopted, to decide the opposite of the most important points without explanation is unreasonable and leads us to question whether this was a genuine and meaningful consultation.

Figure 2

This refers to a design review panel which will assess any masterplan drawn up for a Strategic Site. No indication is given as to the membership of this panel. We strongly urge that it should include community representation therefore the panel for Gosden Hill should include the Burpham Neighbourhood Forum.

Part 2 Design Principles

We fully endorse the comments made in the submission from the Burpham Neighbourhood Forum.

Part 3 Strategic Development Frameworks **05 Gosden Hill Farm**

Paragraph 5.1

The description of this site as a "regeneration project" is specious. The site is a mixture of farm land and woodland, and prior to the adoption of the Local Plan in 2019 was Green Belt.

5.1.2

Burpham is not completely characterised by low density family housing with gardens. This may be true of pre 1950s development but additional building means that Burpham rates as moderate density with approximately 40 dwellings per hectare.

The description of community facilities is not entirely accurate. Burpham has no GP surgery and community facilities are limited in capacity. It is true that Burpham has no railway station but London Road station is less than two miles away, on a bus route and within easy cycling distance.

Paragraph 5.2.3

This paragraph refers to the potential for a station at Merrow. Has Network Rail made a firm commitment to build a station here or is this just wishful thinking based on a single reference? If a station were to be built it would be little more than 3km to the next station at Clandon; this would allow barely enough time for a London bound train to accelerate to speed before decelerating to enter Clandon. Has anyone looked at the feasibility of timetabling? Paragraph 5.10.5 suggests even the authors of this report have doubts: "*In the event that the Guildford East (Merrow) Station is delivered.....*"

Paragraph 5.3 Vision and Design Objectives.

Saying that "Gosden Hill should become a garden community" is an admirable vision until reality is faced. 1,800 dwellings are proposed. That number may well rise, given GBC's propensity for quietly increasing given numbers (see Send). The potential density is unlikely to provide the accepted vision of a garden community.

Fig 25

This is an excellent example of a design that ignores reality. The authors are obviously completely unaware of the current traffic problems that regularly bring Burpham's roads to the point of gridlock.

The proposed on/off southbound A3 access is preposterous. When plans to develop this site were originally drawn up in 1984, a multiway junction near Potter's Lane was considered essential. 36 years later, the considerable increase in traffic volume makes a multiway junction even more essential. This point was raised at the consultation in December 2019 – there was no dissent other than from the GBC representative, and that was purely on cost grounds.

If the two way junction is adopted, along with the proposal to make the A3100 two way, consider this:

- All traffic leaving GHF needing to access the north bound A3 will have to travel to the Clay Lane slip road – through Burpham.
- North bound A3 traffic wishing to access GHF will have to go either via the B2215, A247 and southbound A3 slip or use the A3100. Local and Guildford traffic is far more likely to use the latter route – through Burpham
- The two way junction will give access to the southbound A3. At present, the only Guildford access is at the Wooden Bridge via Parkway, Ladymead and Middleton Road. These roads are frequently heavily congested so how much easier for drivers to access the new southbound slip – through Burpham.
- It should also be noted that southbound A3 traffic held up by an accident further south or simply volume of traffic tries to escape by taking the slip road – through Burpham.

In our response to the Draft Local Plan in July 2016, we noted

*“Without sensible infrastructure changes, particularly in relation to Guildford's unresolved traffic problems **Burpham will degenerate into a giant roundabout** how can this be considered sound and sustainable?*

It would appear that our words fell on deaf ears. ***We would welcome an assurance that this will not happen again.***

Paragraph 5.4.5

Any strategies planned for surface water management must take into account the potential for flooding in Burpham. The stream that drains from Clandon Park runs under the railway from the SE corner of the Burpham Ward boundary, crossing the centre of the south side of the site. It then joins with the stream draining Merrow Common south of the railway that runs alongside Merrow Lane.

The stream then goes under the road to flow between Winterhill Way and Great Oaks Park where it is designated as the Merrow Common River. It continues under the A3, through Weybrook Park to the River Wey. The heavy winter rainfall of 2013/2014 caused serious flooding in Burpham. This resulted in the formation of the Burpham Flood Forum which has to date been chaired by our MP and included all the major agencies and stakeholders involved. We ask that the Burpham Flood Forum should be party to any consultation on surface water management.

Fig 27

The notion that “the site should be linked, physically and functionally, with the surrounding neighbourhoods In particular Burpham and Merrow” needs exploring. The following points should be noted.

- Integration with Burpham and Merrow is desirable on social grounds and will be absolutely necessary if no pub, church or other social facilities are provided. But this appears incompatible with 'minimising travel for everyday purposes' and will only work if quick and easy travel is facilitated.

- Merrow and Burpham are neighbours, separated by a railway line and connected only by one direct road link, the B2234. This is already over capacity and frequently congested, at times stationary from the railway bridge to the A3100. This has led to the use of Merrow Lane as a rat run.
- Fig 27 indicates that part of Merrow Lane will be closed to vehicular traffic and that a route is planned linking the A3 to the proposed new station, thence to join the B2234 (New Inn Lane). This will give a through road from the A3 to Merrow and from Merrow to the A3 and A3100, possibly reducing traffic on New Inn Lane but creating a very busy road traversing the new garden community.
- The B2234 is part of an unofficial North Guildford Circular, linking to Clay Lane which in turn links to the A320 and A322, giving access to places like Woking and Aldershot and therefore carries a considerable amount of non-local traffic.
- The B2234 turns sharp left into New Inn Lane immediately after going under a very narrow railway bridge. This is at present a very busy, often congested, 4 way junction controlled by traffic lights, the other two arms being Merrow Lane and SCC works and industrial estate. **If the wished-for links are to be realised, this bridge will have to be widened.**
- It has to be acknowledged that Burpham itself already attracts a good deal of non-local traffic given it has two popular retail centres, a Sainsbury's superstore and an Aldi supermarket.
- There is a proposed development at Garlick's Arch, just to the north of GHF, of 520 dwellings. It will not have its own retail centre, residents being expected to use existing local shops. Send only has a small row of shops so it is reasonable to assume that many residents will head for the nearest supermarkets – at Burpham.

We note that Fig 27 indicates a key cycle and pedestrian route for B2234 New Inn Lane. This road is narrow and would therefore require widening. The eastern end passes through ancient woodland which is Local Green Space and has a TPO ref.1947 W1, W2, W3 4363/10. Further down, the grass areas to the left are also Local Green Space. If these are to be honoured, there would seem to be little room for manoeuvre. Fig 27 fails to identify Common Land and Local Green Space.

The Park and Ride is located near the A3. If a station is to be built, it would surely be logical to have a combined Park and Ride and car park adjacent to the station.

We note the intent to use the farm entrance to serve 100 dwellings which raises two points.

- Do Martin Grant Homes intend to build a small, perhaps high end development near the farmhouse to raise capital?
- Will the proper infrastructure be in place before this construction begins?

5.6 Movement Framework

The statement "Strategic development at GHF should be planned to ensure the need to travel for everyday purposes is minimised" hovers dangerously close to an oxymoron. The proposed solution is a nonsense.

Fig 29 appears to have been designed as a computer exercise for students: *design a movement network to comply with the aim of minimised travel for everyday purposes. Current traffic conditions can be safely ignored.*

The concept of a Sustainable Movement Corridor (SMC) seems to be based on the principle of a mantra – a statement or slogan repeated frequently, presumably in the hope that if you say it often enough it will happen. An SMC along the A3100 that incorporates bus lanes, cycle routes and other vehicular traffic is impossible to achieve without wholesale demolition of properties – the road simply is not wide enough. The roundabout at the intersection with New Inn lane and Burpham Lane is a notorious pinch point with frequent queueing on

all roads; the A3100 cannot be widened unless GBC are prepared to demolish Aldi, a car sales lot and a garage.

We note that the SMC travels through GHF, exiting just prior to the railway bridge and the “potential continuation of SMC to Merrow and Guildford via Epsom Road.” More wishful thinking.

Fig 30 makes much of key offsite and onsite pedestrian and cycle routes. These are important; there is currently no safe cycling along most of the A3100, especially the stretch from Clay Lane to the Stoke roundabout. Even the existing off-road cycle paths in Burpham need upgrading to ensure they can be used by all cyclists, not just the experienced. However, we would ask that GBC takes cognisance of the fact that most people will continue to use their cars and that needs to be taken into account.

Conclusion

There have already been two major consultations in the last few years for the Local Plan, All the points we have raised in this response have been made before – by the BCA, the BNF and many local residents. Here is an extract from our response to the 2017 consultation:

For years, this village has been subjected to one poorly conceived planning application after another, with no thought given to the infrastructure needed. The last few decades have seen two major housing estates, a considerable number of smaller garden grabbing developments, one super store and, recently, one very inappropriately sited supermarket. The result is daily road congestion that can easily lead to gridlock at peak times or when an incident on the A3 causes a southbound tailback and drivers try and escape via the Burpham exit. The traffic is made up of cars, commercial vehicles and an increasing number of HGVs, all of it pumping out high levels of pollutants – dangerously high levels when vehicles are slow-moving or stationary. Air pollution kills and is rightly concerning national government. It should also concern GBC. How can you contemplate subjecting your residents to the increased number of vehicles that will pass – very slowly - through Burpham

Such observations have been ignored so what is the point of asking residents for their views if you are not going to listen? We live here and we have daily experience of current conditions. Is it not time that the NPPF 2018 should be observed?

*“Planning policies and decisions should play an active role in guiding development towards sustainable solutions, **but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.**”*

Yours faithfully,

Liz Critchfield
Secretary
Burpham Community Association



Appeal Decision

Site visit made on 12 February 2020

by Christopher Miell MPlan MRTPI

an Inspector appointed by the Secretary of State

Decision date: 14th April 2020

Appeal Ref: APP/Y3615/W/19/3241821

81 London Road, Burpham, Guildford GU1 1YT

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Dominic Manser (Godolphin Homes Ltd) against the decision of Guildford Borough Council.
 - The application Ref 19/P/00034, dated 8 January 2019, was refused by notice dated 31 May 2019.
 - The development proposed is demolition of existing dwelling and erection of 3-storey block of 9 flats and 10 car parking spaces.
-

Decision

1. The appeal is dismissed.

Procedural Matters

2. The appellant has submitted a completed unilateral undertaking as part of the appeal, which seeks to overcome the fourth reason for refusal on the Council's decision notice in respect of the effect of the proposal on the Thames Basin Heaths Special Protection Area. I return to this matter later in this Decision.
3. The appellant has submitted an Assessment of Significance (the 'AOS') as part of the appeal. As the submitted document does not evolve the scheme, and the nature of the concerns of those who would normally have been consulted are clear from consultation on the original set of plans, I do not consider that their interests would be prejudiced if I determine the appeal in accordance with this document. For the avoidance of doubt, I have therefore taken into account the AOS in the determination of the appeal.

Main Issues

4. The main issues are (i) the effect of the development upon the character and appearance of the area, including the effect on non-designated heritage assets; and (ii) whether the proposed development would provide adequate off-road parking provision.

Reasons

Character and appearance

5. The appeal property (known as 'Marlyn's Cottage') is a two-storey dwelling, which dates from around 1820. It is proposed to demolish this building and erect a three-storey flatted development of 9 units with off-street parking for 10 vehicles.

6. The surrounding area, including along London Road, has an urban character with a wide variety of property types from differing architectural periods. To the side of the appeal site there is a large three storey block of flats known as 'The Cloisters'. To the rear of the appeal site there is a residential cul-de-sac of two-storey dwellings known as 'The Cedars'. On the opposite side of London Road there are two-storey and three-storey buildings, which includes a local shopping parade.
7. The appeal property was locally listed by the Council in March 2019 and therefore it is a non-designated heritage asset, as defined by the National Planning Policy Framework (the 'Framework').
8. The Council explain that Marlyn's Cottage has special interest due to its age, and its surviving original plan form within its plot; much of which appears intact, and its original materials and details that survive, is characterful within a street that has lost much of its earlier historic open land, buildings and historic character. In addition, they state that the appeal property and Nos 79 and 79a (known as 'Marlyn's House') have group value, as they historically formed part of a single and much wider estate or farm known as Marlyns. Marlyn's House, which is also a locally listed building, is situated to the side of the appeal site and the two buildings are externally connected by a single storey link.
9. The appellant's AOS explains that the architectural style of Marlyn's Cottage is that of a modest, Regency villa of classical design with an Italianate style. However, the property has been altered on several occasions since its original construction. Most notably, front bay windows, a side extension and a rear extension were added to the building in the mid to late 1800's, all of which would have materially altered the fabric and appearance of the original building and likely resulted in the total rebuilding of the front elevation.
10. Whilst I recognise that the historic alterations have undermined the original architectural coherence of the building, the appeal property retains many high-quality historic features, albeit that some are not original but still of a significant age, and it is located within a generous plot behind a large front garden area, which features extensive areas of mature landscaping near to the roadside boundary. Consequently, the appeal property and its spacious setting contributes positively to the character and appearance of the local area.
11. Despite the varied street context and the extent of recent development within close proximity to the appeal site, Marlyn's Cottage and Marlyn's House retain visual connectivity and form a cluster of attractive historic buildings near to the corner of London Road and The Cedars. Whilst the historic rural setting of the buildings has been lost over time by the urbanisation of Burpham, Marlyn's Cottage and Marlyn's House are widely visible from the local street context and contribute positively to the local distinctiveness of the area.
12. The proposal would introduce a large three storey development at the appeal site, which would occupy a significant amount of the plot width and be sited noticeably closer to the side boundary with The Cloisters than the existing dwelling. In addition, the proposal would be sited much further forward to the road frontage than the appeal property. In this context, the proposal would have a cramped appearance when compared to the spacious characteristics of the existing site layout.

13. In addition, the proposed car park would dominate the front of the appeal site and result in the loss of most of the existing mature landscaping, thereby causing unacceptable harm to the character and appearance of the area. Whilst I acknowledge that the front boundary wall would provide a degree of screening of the to the proposed car park, extensive public views of this area would be apparent from London Road due to the open nature of the vehicular access.
14. The appellant argues that forecourt parking is common within the local area and he states that similar arrangements exist at Marlyn's House and The Cloisters. On my site visit, I observed that private roadside parking was provided for the residents of Marlyn's House on The Cedars, whilst the front garden of Marlyn's House featured a pedestrian footpath and mature landscaping.
15. In terms of The Cloisters, whilst extensive forecourt parking is provided for residents, the site is screened by mature trees, shrubs and fences and therefore the parking of vehicles is not conspicuous or dominant when view from the street. Indeed, the appellant's AOS states that '*the view from London Road is of a thick stand of greenery interrupted by a gated entrance with glimpses of the development beyond*'. Therefore, I consider that the parking arrangements of the neighbouring properties are not comparable to the current proposal.
16. In terms of the design of the proposal, despite the use of traditional materials and the inclusion of an external link with Marlyn's House, the block of flats would have a stark and jarring appearance when viewed in the context of Marlyn's House. Indeed, the proposed parapet roof form along with the large flat roof dormer windows on the front elevation would emphasise the bulky form of the proposed development in relative terms, whilst the eaves height of the proposal would be at odds with the neighbouring property which has lower eaves.
17. My attention has been drawn to a planning permission from February 2017¹ which permits the erection of a two-storey side extension, a single-storey rear extension and a single-storey rear infill extension to the appeal property. The appellant contends that the construction of the approved development would result in a building of similar height and bulk when compared to the current proposal.
18. The appellant explains that commencement occurred in December 2019 when foundations were dug, and concrete was laid and therefore he contends that the permission remains extant. However, the Council state that there is no way for them to know whether these foundations are in accordance with the planning application particularly as an application for a certificate of lawful development has not been submitted or approved. Consequently, the position on this matter is unclear, noting also that the standard three-year commencement period has now passed.
19. Notwithstanding the above, the approved development is in any event fundamentally different to the current proposal. The approved development would retain the height of the existing building and does not include second floor accommodation, or large dormer windows. In addition, the approved

¹ Council Ref: 16/P/02555

development would occupy a smaller footprint than the current proposal and retain the existing mature landscaping at the front of the appeal site. Therefore, I have afforded the aforementioned planning permission limited weight in my considerations.

20. Paragraph 197 of the Framework states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
21. For the reasons set out above, the proposed development would cause significant harm to the character and appearance of the area. This harm would arise from (i) the total loss of a non-designated heritage asset; and (ii) the design and appearance of the proposed development. This in turn, would cause significant harm to the setting of Marlyn's House, which is a locally listed building. Accordingly, the proposed development would be harmful to the significance of the non-designated heritage assets.
22. Given the above, I conclude that the proposal would not accord with Policies D1 and D3 of the Guildford Borough Local Plan: Sites and Strategies (April 2019) (the 'LP'), Saved Policies G5 (2), (3), (4), (7) and H4 of the Guildford Borough Local Plan (January 2003) and Policies B-FD1 and B-EN4 of the Burpham Neighbourhood Plan 2015-2035 (April 2016) (the 'NP') which, amongst other things, collectively require new development to be of a high quality design, which responds to the site context and local character; and to sustain and, where appropriate, enhance the special interest, character and significance of the borough's heritage assets and their settings and make a positive contribution to local character and distinctiveness.
23. Accordingly, the proposal would also be inconsistent with paragraph 127(c) of the Framework, which requires development to be sympathetic to the local character. In addition, paragraph 130 of the Framework states that planning permission should be refused for development of poor design.
24. In reaching the above conclusion, I note that the appellant disputes the locally listed status of the building, with the AOS concluding '*that the building is of low significance even when assessed purely in a local context, noting also the minimal contribution of setting*'. Even if the existing building was not worthy of being locally listed and I were to agree with the views of the appellant that the loss of the non-designated heritage asset would be acceptable, the proposed development would still be unacceptable in design terms and would cause significant harm to the setting of Marlyn's House, which is a locally listed building. In other words, the acceptability or otherwise in respect of the loss of the appeal property as a locally listed building is not a determinative issue in terms of the consideration of this appeal.

Parking provision

25. Policy B-T1 of the NP sets minimum parking standards for new development within Burpham. For residential development, the policy sets out that one-bedroom units should be provided with a minimum of one off-road parking space and for two-bedroom units, a minimum of two off-road parking spaces should be provided. In addition to off-road parking for future residents, the

policy states that *'suitable provision must also be made for visitor parking and delivery vehicles to park safely for the duration of their visit'*.

26. The Council explain that to meet the NP's minimum parking standards, the proposed development would need to provide 15 off-road parking spaces for future residents. The proposed development would provide 10 off-road parking spaces for future residents, whilst no dedicated off-street parking would be provided for visitors or delivery vehicles. In addition, no technical information has been submitted to demonstrate that delivery vehicles could enter and exit the site in forward gear. Consequently, the proposed development would not accord with the parking standards set out within Policy B-T1 of the NP.
27. Notwithstanding the conflict with Policy BT-1 of the NP, the appellant argues that the proposed development provides a suitable amount of off-road parking for future residents, which takes account of the site's location within Burpham, which he argues is well served by bus services with good access to Guildford town centre. In addition, he explains that there are a high number of local facilities and services within walking distance of the appeal site.
28. On my site visit, I observed that the site is located in close proximity to a local shopping parade, which offers a variety of services, and a supermarket, all of which are accessible by the existing pavement network. Therefore, I am satisfied that walking to the services and facilities within the local area would be an attractive alternative to the use of the private motor vehicle for many journeys.
29. However, no details have been put forward about the location of the bus stop(s), any bus routes or the frequency of any service. Therefore, based on the evidence before me, I cannot conclude that there are frequent bus services available within the local area which would provide a suitable and alternative means to commute to and from work on a daily basis. Consequently, the uncertainty relating to this matter is such that I am unable to conclude that bus services are available that would provide an attractive alternative to the use of the private motor vehicle for most journeys.
30. My attention has been drawn to an appeal decision² from June 2017, which relates to the proposed redevelopment of Nos 178-184 London Road, Guildford. The proposal sought planning permission for the demolition of the existing buildings and the erection of ten flats. Whilst the appeal was dismissed, the Inspector found that the appeal site's location justified a lower parking provision than the parking standards set out within Policy B-T1 of the NP.
31. In coming to this conclusion, the Inspector noted that the appeal site was sustainably located, being close to Guildford town centre and served by a frequent and regular bus service. However, no plans or supporting information about the proposed development has been submitted and therefore I am unable to assess the relevance of the decision, particularly in relation to the extent of the parking shortfall and the availability of local bus services. As such, I have given limited weight to the appeal decision in my considerations.
32. The supporting text of Policy B-T1 of the NP explains that the parking standards are designed to prevent on-street parking which has proved unsustainable in Burpham due to the narrow lanes and roads and the high level

² Appeal Ref: APP/Y3615/W/16/3162826

- of car ownership. It states that this in turn, can prevent public transport and emergency vehicles entering estates and should be discouraged at the design stage.
33. In the absence of the minimum of 15 off-road parking spaces for future residents, plus parking facilities for visitors and deliveries, it therefore seems likely that vehicles would either become blocked-in, or that there would be displacement of parking on to the highway. On my site visit, I noted that London Road had a cycle lane in both directions, which would prevent on-street parking in this location at any time. In addition, on my site visit I observed that there were very limited, if not any, opportunities for on-street parking at The Cedars due to the narrow road layout and the prevalence of dropped kerbs.
34. London Road is a classified A-road (the A3100), which serves the surrounding urban area. During my site visit, I observed that the road was busy with high volumes of traffic travelling in both directions. Given the limited degree of off-road parking provided as part of the proposed development and lack of on-street parking opportunities at The Cedars, and despite the parking restrictions along London Road, I consider that it is likely some vehicles, in particular delivery vehicles, would pull up on the road, which would unacceptably impede the free flow of traffic and the use of the cycle route on London Road. If overspill parking did not occur on London Road, it is likely that it would occur within the Burpham local area, which already experiences localised issues, as identified within the supporting text of Policy B-T1 of the NP.
35. I recognise that the Local Highway Authority (the 'LHA') do not object to the proposal and that the level of off-street parking provision would accord with the parking standards set out within the Surrey County Council Vehicular and Cycle Parking Guidance (January 2018) (the 'VCPG'). However, the purpose of the VCPG is to provide County wide guidance to several local planning authorities, and unlike the NP, the VCPG does not form part of the development plan.
36. Planning law³, as noted by Paragraph 12 of the Framework, dictates that planning applications must be made in accordance with the development plan unless material considerations indicate otherwise. Whilst the VCPG and the LHA's consultation response are material considerations, they do not overcome or outweigh the very weighty conflict with the Policy B-T1 of the NP.
37. In addition to the minimum parking standards, Policy B-T1 of the NP sets out that off-road car parking spaces must be 2.6 metres (width) by 6 metres (length) or 2.6 metres (width) by 7 metres (length), if parallel parked. The policy explains that the spaces should be '*large enough to accommodate the size of modern vehicles*'. In this instance, the parking spaces would measure 2.6 metres (width) by 5.4 metres (length), which would conflict with Policy B-T1 of the NP. However, it is unclear why there is a requirement for the parking spaces to be so long, especially when a 5.4 metres parking space would accommodate most large family vehicles. Indeed, there is tension with other documents, such as the Manual for Streets (2007), which advises that standard parking spaces should measure 2.4 metres (width) by 4.8 metres (length). Whilst the proposal would conflict with the NP car parking size requirements, in this case I have not been provided with any evidence to justify why the proposed car parking spaces would be insufficient to meet day to day needs.

³ Section 38(6) of the Planning and Compulsory Purchase Act 2004

38. In conclusion, for the reasons given above, the proposed development would fail to provide adequate off-road parking provision and consequently unacceptable harm would be caused to the free flow of traffic on London Road. Therefore, the proposal would not accord with Policy B-T1 of the NP or Policy ID3 of the LP, which amongst others states that off-street vehicle parking for new developments should be provided such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. Whilst the size of the proposed car parking spaces would be acceptable in this case, this does not overcome my concerns about the failure of the proposal to accord with the minimum on-site car parking number requirements.

Other Matters

39. The appeal site is within the 'zone of influence' of the Thames Basin Heaths Special Protection Area (the 'SPA'). Had the proposal been acceptable in planning terms, it would have been necessary for me to determine the acceptability or otherwise of the appellant's unilateral undertaking and undertake an Appropriate Assessment (AA) as the competent authority. However, regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 indicates the requirement for an AA is only necessary where the competent authority is minded to approve planning permission.
40. The provision of an additional eight dwellings at the appeal site would make a positive contribution to the Council's housing land supply which weighs in favour of the proposal. Furthermore, I recognise that the proposal would lead to the development of previously developed land as opposed to the Green Belt. However, none of these matters would overcome the very weighty conflict with the identified development plan policies as outlined in the main issues above.
41. The site is near to Nos 200-202 London Road (Known as 'Inn Farmhouse' and 'Lilac Cottage'), both of which are Grade II listed buildings situated on the opposite side of London Road. In determining the application, the Council concluded that the proposal would preserve the setting of the aforementioned listed buildings. Based on my site visit, which also included a consideration of the separation distance between the site and the listed buildings and the layout/scale of the proposed development, I have no reason to disagree with the Council in respect of this matter. However, this is a matter of neutral consequence in the overall planning balance.
42. Reference has been made with regards to the Council's handling of the planning application. However, this is not relevant to the consideration of the appeal.

Conclusion

43. For the reasons given above, and having regard to all other matters raised, I conclude that the appeal should be dismissed.

Christopher Miell

INSPECTOR