



Appeal on Behalf of Guild Living

Epsom General Hospital, Dorking Road, Epsom KT18 7EG

Summary Townscape Proof of Evidence

LPA Ref: 19/01722/FUL and 21/00252/FUL

Appeal Ref: APP/P3610/W/21/3272074 and APP/P3610/W/21/3276483

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July 2021

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1. INTRODUCTION

1.1. Background

- 1.1.1. My name is Andrew Williams. I am a qualified Urban Designer, Chartered Landscape Architect and a founding Director of Define; a Town Planning, Urban Design and Landscape Architecture practice.
- 1.1.2. I was appointed by Guild Living in January 2021 to review the proposed revised planning application (21/00252/FUL), with my audit being submitted in support of this application. I subsequently advised in respect of the Wheatcroft amendments to the first refused application (19/01722/FUL). My advice identified that there was no reason why a number of the positive changes made to Appeal B could not be applied to Appeal A, which subsequently were included within the Wheatcroft amendments. I give evidence in respect of townscape and visual effects, landscape frontage and amenity issues.

1.2. Main Issues

- 1.2.1. My evidence addresses the first and second reasons for refusal for both Appeal A (19/01722/FUL) and Appeal B (21/00252/FUL), namely harm to the character and appearance of the area (1), and insufficient landscape opportunities to mitigate development impacts, causing harm to the character and appearance of the area (2).
- 1.2.2. This reflects the relevant main issues as summarised by the Case Management Conference, as amalgamated into a single item¹, being:

- a) The effect of the proposal on the character and appearance of the area (this item will include impacts on existing trees and scope for new landscape works);*

1.3. Summary Evidence

- 1.3.1. This summary proof of evidence provides an overall summary of my more detailed proof of evidence and appendices. Reference to Table numbers cross refer back to my main proof of evidence and are not consecutive.

¹ Item 6a of PINS note of the CMC dated 15 June

2. SUMMARY EVIDENCE

2.1. Planning Policy and Guidance

2.1.1. National and local policy is consistent in requiring development to be sympathetic to the character and history of its context. It must also optimise the use of land and how these two objectives relate is often a key issue for townscape and visual assessment and this clearly applies to Appeals A and B.

2.2. Description of Site and Appeal Scheme(s)

2.2.1. The appeal site comprises two substantial buildings (Rowan House at 18.4 metres in height and Woodcote Lodge at 10.8 metres in height) and a former building now used for car parking.

2.2.2. Epsom Hospital is located to the immediate north of the appeal site and contains other substantial buildings, in some cases of over 100 metres in length and over 28 meters in height.

2.2.3. The Scheme Also abuts a number of 2 storey residential properties on Woodcote Green Road, Digidens Rise and Hylands Road.

2.2.4. The scheme design for Appeal A and B follows a very similar arrangement. Building A has a parking podium, wrapped on its northern side by higher accommodation (to 8 or 9 storeys), with the building continuing southwards towards Woodcote Green Road, stepping down in height towards this boundary with the building terminating on an equivalent building line to no. 40 Woodcote Green Road.

2.2.5. Building B (for both schemes) positively address Woodcote Green Road, with a set back from the footpath of between around 5 and 10 metres, with the building block wrapping a plaza and extending northwards towards the main hospital building.

2.2.6. The layout for Appeal A and Appeal B are very similar in approach. Following a Wheatcroft amendment for Appeal A the only notable townscape differences between the Appeal schemes is the reduced height of Buildings A and B, at both its higher building elements and also at a lower level adjacent to Woodcote Green Road.

2.2.7. I set out over the page the comparable heights with reference to existing site buildings, all making reference to the respective highest points in metres above Ordnance Datum (as building heights for its finished floor level does not allow comparison across the site due to the varied ground floor levels).

Table 1 – Comparable Maximum Building Heights

Building ref	Existing Buildings Height (m AOD)	*Appeal A Roof Parapet Level (m AOD)	**Appeal A Roof Level SSL (m AOD)	***Appeal B Parapet Level (m AOD)	Difference between Appeal B and Appeal A (m AOD)
Building A (max height AOD)	-	92.36	90.75	86.345	-6.015
Building A (max height adj to Woodcote Green Road)	-	77.12	78.12	73.745	-3.375
Building B (max height AOD)	-	91.85	90.75	85.575	-6.275
Building B (max height adj to Woodcote Green Road)	-	74.675	73.85	72.975	-1.7
Wells Wing (max height AOD to main parapet)	79.95	-	-	-	-
Wells Wing (max height AOD to central projection)	87.74	-	-	-	-
Rowan House (approx. height to parapet)	77.438	-	-	-	-
Woodcote Lodge (approx. height to parapet)	70.375	-	-	-	-

* Parapet Level not indicated on submitted scheme A drawings (referenced in Scheme B DAS page 85 & 86)

** Roof slab level indicated on submitted scheme A drawings (excluding roof build up)

***Parapet Level indicated on submitted scheme B drawings

2.3. Townscape and Visual Baseline

2.3.1. The Council's evidence base includes an Environmental Character Study (ECS) that assesses a wide range of townscape character areas and identifies their boundaries on a plan. The detailed assessment considers the various qualities and characteristics of each townscape character area, and in some cases sub-character areas, leading to a conclusion in respect of the areas overall sensitivity to received development within the parcel.

2.3.2. The appeal site is located within TCA 35E and is adjacent to TCAs 36 and 37. I set out (at Table 4 below) a summary of the sensitivity of these TCAs to the type of change proposed, referencing the findings of the HTVIA submitted with the respective applications, the ECS and my evidence.

Table 4 - Comparison of Townscape Sensitivity Judgements

Townscape Receptor (ECS / AW)	Townscape Receptor ((HTVIA)	Environmental Character Study	HTVIA	AW Evidence
TCA 34	Schnadhorst Memorial Ground	Medium-High	Medium	Medium
TCA 35	Dorking Road	Medium	Low-Medium	Low-Medium
TCA 35A	TCA 35A	Medium		Low-Medium
TCA 35E		Low		Low
TCA 36	Digdens Rise/Woodcote G	Medium	Low-Medium	Medium
TCA 37	Millennium Green		Medium	Medium-High
Chalk Lane CA	Chalk Lane CA		High	Medium
	Woodcote CA		Medium-High	
	Stamford Green POS		High	

2.3.3. In respect of visual amenity, I have assessed the HTVIA viewpoints (1-15) and have identified those specifically that I consider to have the potential to receive visual effects and have simplified these into five groups. I set out at Table 4 below my conclusion in respect of the sensitivity of these visual receptors, with reference to the judgments made in the HTVIA for those comparable visual receptors.

Table 5 - Comparison of Visual Sensitivity Judgements

Receptor Group	Viewpoint Ref	HTVIA	AW Evidence
Group 1	2 and 11	Low	Low-Medium
Group 2	1	Low	Medium-High
Group 3	3	Medium	Low-Medium
Group 4	8	Medium	Medium
Group 5	9	Low	Low

2.3.4. In summary, the highest sensitivity townscape receptor is TCA 37 (medium – high), specifically due to the nature of the Millennium Green area and associated woodland. Similarly, the highest sensitivity visual receptor are views from Group 2 (Millennium Green) which is medium-high. Otherwise both townscape and visual receptors range from a sensitivity of low to medium.

2.4. Appeal A - Townscape and Visual Effects

2.4.1. In respect of townscape effects, I find that the Appeal A scheme gives rise to a number of neutral / no effects, as well a single slight beneficial effect to the townscape character area in which it is located, and a slight adverse effect on the townscape to its immediate south west (TCA 36 Woodcote Road). Table 5 summarises these conclusions over the page.

Table 6 – Appeal A – Townscape Effects Summary

Townscape Receptor	Effects at Completion / Maturity
TCA 34	Slight and Neutral to No effect
TCA 35	Slight and Neutral to No effect
TCA 35A	No effect
TCA 35E	Slight Beneficial
TCA 36	Slight Adverse
TCA 37	Moderate and Neutral
Chalk Lane CA	Slight Neutral

2.4.2. In respect of visual effects, I find that the Appeal A scheme gives rise to a number of neutral effects and two moderate adverse effects. The adverse effects relate to receptor groups 1 and 3 (Woodcote Green Road and Chalk Lane Conservation Area). Table 6 summarises these conclusions below.

Table 7 – Appeal A – Visual Effects Summary

Receptor Group	Viewpoint Ref	Effects at Completion / Maturity
Group 1	2 and 11	Moderate Adverse
Group 2	1	Substantial Neutral
Group 3	3	Moderate Adverse
Group 4	8	Slight Neutral
Group 5	9	Slight Neutral

2.4.3. In terms of policy compliance, I find the Appeal A scheme to be consistent with national and local policy insofar that it optimises the use of land and is sympathetic to the character of the area in which it is located. Some policy conflict exists with DM9 due to the contrast between the proposed scheme and its suburban context and the moderate adverse effects that result in close range worst case viewpoints.

2.5. Appeal B - Townscape and Visual Effects

2.5.1. In respect of townscape effects, I find that the Appeal B scheme gives rise to a number of slight and neutral / no effects, and also some notable beneficial effects. This includes the Epsom Hospital site itself, but also TCA37, including the Millennium Green site, where the positive built and landscape frontage is not undermined or diluted by the presence of additional accommodation. Table 8 summarises these conclusions below.

2.5.2. In respect of visual effects, I find that the Appeal B scheme gives rise to a number of neutral effects and a substantial and beneficial effects, relating to the visual experience from the Millennium Green open space within TCA 37 (see Table 8 over the page).

2.5.3. In terms of policy compliance, I find the Appeal B scheme to be consistent with national policy insofar that it optimises the use of land and is sympathetic to the character of the area in which it is located. The scheme promotes a positive design approach and sensitively handles the form and appearance of the proposed buildings to assimilate as successfully into its context as possible without adverse effects arising.

2.5.4. In respect of local policy, the scheme's virtues are as set out above and this is aligned with policies DM9 and DM10. I do not consider the density restriction of DM11 to be applicable due to the scale of the existing site buildings not being commensurate with his density restriction. Similarly, the height restriction of DM13 cannot be applicable as there are buildings far taller than the restriction it creates in the immediate context of the site, and indeed within the appeal site itself.

Table 8 – Appeal A – Townscape Effects Summary

Townscape Receptor	Effects at Completion / Maturity
TCA 34	Slight and Neutral to No effect
TCA 35	Slight and Neutral to No effect
TCA 35A	No effect
TCA 35E	Slight Beneficial
TCA 36	Slight Neutral
TCA 37	Moderate Beneficial
Chalk Lane CA	Slight Neutral

Table 9 – Appeal A – Visual Effects Summary

Receptor Group	Viewpoint Ref	Effects at Completion / Maturity
Group 1	2 and 11	Moderate Neutral
Group 2	1	Substantial Beneficial
Group 3	3	Moderate Neutral
Group 4	8	Slight Neutral
Group 5	9	Slight Neutral

2.6. Woodcote Green Road Frontage

2.6.1. Overall, it is clear from my analysis that both Appeal A and B propose a very positive landscape feature along Woodcote Green Road that is possible due to the proposed buildings addressing this street being aligned with the existing building line (and therefore set back from Woodcote Green Road). This allows a predominant double row of trees to be proposed which would create a very strong and positive landscape feature, in place of an existing poor quality and negative landscape feature. It would also create a strong

landscape connection through to the Millennium Green open space, and improve the outlook and character of this space.

2.6.2. My conclusion is that this claim of harm or case of an opportunity not being taken is incorrect and inaccurate.

2.7. Overall Conclusion

2.7.1. I consider the architectural approach of both Appeal A and B to be positive. They respond favourably to the key site edges, creates an interesting and varied design response that acts to stitch together a currently discordant, low value and negative townscape contributor to the local area. Both schemes use a palette of materials that maximises assimilation into the contrasting sub-urban context, but inevitably the contrast between the hospital site and its context leads to some close range views where this contrast can be seen and experienced.

2.7.2. My analysis of Scheme A is that the townscape effects broadly balance out to a neutral overall effect and there are some adverse visual effects (from local, worst case viewpoints) due to the contrast between the scale of the proposed development and its sub-urban context. This relationship has clearly been a part of the history of the site for many years, with the hospital site (formerly the Union Workhouse) and the appeal site (including nurses accommodation and ancillary use) being on a clearly different scale than its context.

2.7.3. My analysis of Scheme B is that it maintains the design virtues I describe above, but the reduced visibility of the taller building elements from some selective locations close to the site does change the assessment as the built form is less visible and contrasting with its suburban context.

2.7.4. Overall, it is expected for an urban regeneration scheme such as this, that takes place on a site with significant and visible tall buildings, whilst being located within a low-rise suburban context, that some adverse townscape and visual effects are to some degree expected.

2.7.5. I consider those adverse townscape and visual effects generated by Scheme A to be relatively well contained (being one slight adverse townscape effect and two moderate adverse visual effects) and should be balanced with the recognition of a slight beneficial townscape effect.

2.7.6. In respect of Scheme B, the reduction in building heights enables the townscape contrast between the scheme and its suburban context to be even more successfully contained and results in slight and moderate townscape benefits and neutral or substantial beneficial visual effects.

2.7.7. In summary, and measured against the Council's claimed harm, both appeal schemes:

1. Modulate their massing so that the larger built form is focused towards the more central locations of the Epsom Hospital site where they can be successfully accommodated and reduce massing to the Woodcote Green Road edge.
2. Set back from Woodcote Green Road to provide an appropriate edge and take the

opportunity to introduce a wider green edge to this street.

3. Utilise warm tones and materials to enable the proposed built form to sit comfortably into the sub-urban environment, whilst recognising that inevitably the massing and design of these buildings differ from their sub-urban context (a contrast that has been in place due to the site's history for many years).
4. Do not represent over-development. The site is brownfield, has always contained buildings of a significantly different scale than its sub-urban context and this must be recognised as an opportunity to optimise the site. Appeal A contains recognisably higher built form than Appeal B, but neither dominate the surrounding townscape.
5. Promote green space that complements the scheme design. The central plaza and emphasis towards Woodcote Green Road frontage is both appropriate and balanced, resulting in a real benefit to the environment and attractiveness of the Millennium Green open space.