

Mr Kearley
QED Planning
Wesley House
Bull Hill
Leatherhead
Surrey
KT22 7AH

Town Hall
The Parade
Epsom
Surrey
KT18 5BY
Main Number (01372) 732000
www.epsom-ewell.gov.uk

5th July 2019

Contact: Ginny Johnson
Direct line: 01372 732398

Your Ref: 19/00460/PREAPP

Email: vjohnson@epsom-ewell.gov.uk

Dear Mr Kearley,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

RE: Epsom General Hospital, Dorking Road, Epsom, Surrey, KT18 7EG

PROPOSAL: Redevelopment of site (including demolition of existing structures) to provide a new care community including assisted living units, a transitional care unit, communal and wellbeing facilities, occupational therapy centre, key worker accommodation and children's nursery

Thank you for your request, received on 07.05.2019 and our meeting on 04.06.2019, for advice in relation to the redevelopment of part of Epsom General Hospital, to provide a new care community, including assisted living units, a transitional care unit, communal and wellbeing facilities, occupational therapy centre, key worker accommodation and children's nursery.

Please accept the following information as advice from Epsom and Ewell Borough Council regarding the development proposals at Epsom General Hospital. The advice is given following consultation with relevant colleagues. The plans/documentation considered are as follows:

- Cover Letter
- A0.01 Rev A – Site Plan – dated 07.09.2018
- Pre-Application Statement, dated April 2019
- Pre-Application – Design Presentation – dated 18 April 2019
- Legal Opinion Report, by Pinsent Masons.

The Planning Officer responsible for coordinating and preparing this initial advice is Ginny Johnson. If you would like to discuss this advice, please telephone 01372 732398 or email VJohnson@epsom-ewell.gov.uk.

The Site

The Application Site ('Site') is located to the South of the wider Epsom General Hospital Site. It measures approximately 1.5 hectares in size and comprises redundant healthcare buildings and associated infrastructure. The NHS has identified the land as surplus to requirements.

Specifically, the Site comprises:

- A four storey brick building (Rowan House)
- A four-storey apartment block (since demolished)
- A three-storey residential block, providing staff accommodation
- Office administrative buildings
- Temporary structures
- Boiler house with associated chimney stack
- Surface car parking spaces.

The Site is accessed from Woodcote Green Road.

The Site is well connected. Epsom Train Station is located approximately 1.2 kilometres to the North-East of the Site. There are a number of bus stops located on Woodcote Green Road.

The Site is designated as a “Built Up Area”. It is not Listed, nor does it fall within a Conservation Area. However, it lies in close proximity to Chalk Lane Conservation Area and Woodcote Conservation Area.

Recent Relevant History

Epsom General Hospital is subject to an extensive planning history. There is no recent or relevant planning history specifically relating to the buildings located on the parcel of land identified for redevelopment.

Proposal

The proposal seeks to provide an undefined number of 1, 2 and 3 bedroom accessible, assisted living apartments for sale, falling within Use Class C2. It seeks:

- The provision of transitional care suites for hospital use;
- Key-worker units for hospital use;
- Wellness facilities to provide residential care, also available for hospital use; and
- Residential landscaped amenity spaces.

Relevant Policies

The proposal has been assessed against the relevant policy background:

National Planning Policy Framework

Chapter 11	Making effective use of land
Chapter 12	Achieving well-designed places

Core Strategy (2007)

Policy CS5	Conserving and Enhancing the Quality of the Built Environment
Policy CS7	Providing for Housing and Employment Development
Policy CS8	Broad Location of Housing Development
Policy SC16	Managing Transport and Travel

Development Management Policies Document (2015)

Policy DM4	Biodiversity and New development
Policy DM5	Trees and Landscape
Policy DM9	Townscape Character and Local Distinctiveness
Policy DM10	Design Requirements for New Developments (including House Extensions)

Policy DM11	Housing Density
Policy DM21	Meeting Local Housing Needs
Policy DM34	New Social Infrastructure
Policy DM37	Parking Standards

The Issues are discussed as follows:

- Principle of Development
- Provision of Use Class C2 accommodation
- Design and Heritage
- Heights and Density
- Affordable Housing
- Access and Parking

Principle of Development

The key principle to consider for this pre-application request is the loss of the existing hospital facilities at the Site.

Policy CS13 sets out that the loss of community facilities will be resisted unless:

- it can be demonstrated that there is no longer a need for such a facility in either its current use, or in any other form of community use; or
- there is an appropriate alternative means of providing an equivalent facility.

The provision of new community facilities will be encouraged, particularly where they addresses a deficiency in current provision, and where they meet the identified needs of communities.

Policy DM34 sets out that the net loss of community facilities will be resisted unless:

- the proposal is supported by clear and robust evidence that demonstrates that the facility is no longer needed;
- where appropriate, it has been vacant and marketed for a community use without success for at least 18 months; or
- it can be re-provided elsewhere in a different way.

Policy CS12 requires developers to demonstrate that the service and community infrastructure necessary to serve a development is available. Where implementation of a development would create the need to provide additional or improved community facilities and infrastructure, or where an existing deficiency would be exacerbated, necessary provision will be expected.

In line with the above, any future Planning Application at the Site would be required to robustly demonstrate that there is no longer a need for the existing community facilities in their current use, or in any other form of community use, or that there is an appropriate alternative means of providing equivalent facilities. In line with Policy CS12, any future Planning Application should demonstrate that the service and community infrastructure necessary to serve the proposed development is available. Necessary provision would be expected if the development creates a need to provide additional or improved community facilities and infrastructure, or where an existing deficiency would be exacerbated.

In summary, Local Planning Policy seeks to retain or secure an appropriate level of community infrastructure provision to meet the needs of its evolving population. Any future Planning Application would be required to robustly demonstrate that there is no longer a need for the existing community facilities in their current use, or in any other form of community use, or that there is an appropriate alternative means of providing equivalent facilities.

Provision of Use Class C2 accommodation

Chapter 11 of the NPPF relates to the effective use of land. Paragraph 117 of the NPPF sets out that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Policy CS7 sets out that the Borough seeks the provision of sufficient housing. Supporting paragraph 3.11.1 of the Core Strategy sets out that new housing development in Epsom and Ewell will be focused in locations that perform best in sustainability terms.

Policy CS8 sets out that that new housing development will be located within the defined built up area of Epsom and Ewell. Within these areas, the emphasis will be on the re-use of suitable previously developed land (including the re-use of conversion of existing buildings) for housing. Subject to other policies, planning consent will be given for development within the built up areas, including infilling, redevelopment and conversion.

Policy DM21 sets out that planning permission will be granted for specialised forms of residential accommodation, subject to the following requirements being met:

1. That the application documentation includes clear and robust evidence that demonstrates that there is a need for the new accommodation; and
2. The delivery of the new accommodation does not result in an over-provision of that particular type of accommodation; and
3. The design of the proposal is demonstrated as being sufficiently flexible to readily accommodate conversion to other appropriate uses, either residential or non-residential, in the event that the need for the permitted use declines.

The Site is located within a 'Built Up Area', which in accordance with Policy CS8, is an area deemed appropriate for housing development. The Principle of Use Class C2 development at the Site is likely to be acceptable, subject to the above three requirements being robustly justified and evidenced.

In summary, the provision of C2 Use development at the Site is likely to be acceptable, subject to the requirements set out in Policy DM21 being satisfied. A future Planning Application must provide robust evidence, demonstrating a need for this type of accommodation within the Borough, evidence that it will not result in an over-provision of such accommodation and that the design of the proposal is flexible enough to readily accommodate conversion to other appropriate uses.

Design and Heritage

Principles of good design should be embedded within proposals from the outset, as stipulated within National and Local Planning Policy.

Chapter 12 of the NPPF relates to the achievement of well-design places. Paragraph 124 sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 131 of the NPPF sets out that in determining applications, great weight should be given to outstanding or innovative designs, which promote high levels of sustainability,

or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policy CS5 sets out that development should create attractive, functional and safe environments and should reinforce local distinctiveness.

Policy DM9 sets out that planning permission will be granted for proposals that make a positive contribution to the Borough's visual character and appearance. Policy DM10 reinforces that proposals will be required to incorporate principles of good design.

Policy DM10 sets out that development proposals will be required to incorporate principles of good design. Development proposals should (inter alia) have regard to the amenities of occupants and neighbours.

The proposals included within the Pre-Application – Design Presentation – dated 18 April 2019 show two main blocks (A and B) that will comprise C2 uses. The heights are undefined, however Block A is a horse-shoe shape with stepped massing, located to the South-West of the Site. Block B is L shaped, also with stepped massing and located to the South-East of the Site. A presentation provided by the applicants at the meeting on 04.06.2019 showed an alternative form of massing which officers considered to be a significantly better form of development on the Site. No hard copies of this have been provided, however. This also showed mass of heights which could be in excess of 10 storeys. The updated pre-application design presentation showed a development configured to optimise connectivity and permeability with the existing hospital buildings to the North and the public green spaces to the South of the Site.

Principles of good design should be embedded within proposals from the outset. High quality buildings are expected at this Site and great weight will be given to outstanding or innovative designs, which promote high levels of sustainability and which help to raise the standard of design more generally in the area. Officers appreciate that the design of the proposal is indicative at this stage, but encourage the applicant to develop the proposals further. A contemporary design is appropriate for this Site.

Whilst the Site itself is not Listed, nor does it fall within a Conservation Area, it does lie in close proximity to two Conservation Areas. Any development at the Site must be sensitively designed to respect the significance of the nearby Conservation Areas. Additionally and importantly, the Site's surrounding area is typically residential in character. Any development at the Site should be carefully designed to ensure that it does not adversely impact immediate residential amenity, in terms of overbearing, loss of privacy, outlook, sunlight/daylight, and noise and disturbance, in line with the requirement of Policy DM10.

In summary, high quality buildings are expected at the Site and great weight will be given to outstanding or innovative designs, which promote high levels of sustainability and which help to raise the standard of design more generally in the area. A contemporary design is considered appropriate for this Site. The proposal should assimilate with its surroundings and ensure that there is no adverse impact on adjacent residential amenity.

Heights and Density

Chapter 11 of the NPPF relates to making effect use of land. Paragraph 123 sets out that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each Site.

Policy DM11 (Housing Density) and D13 (Building Heights) was formally set aside in May 2018 as it was restricting growth in the Borough. A tall building at this Site is considered

appropriate, subject to high quality design and ensuring that it is compatible with its immediate surroundings and respects the wider surroundings.

The existing buildings on the Site range from 2 to 4 storeys in height. Buildings located at the wider Epsom Hospital Site reach 8 storeys in height. The Pre-Application – Design Presentation – dated 18 April 2019 does not clearly set out the proposed heights of the buildings, however Officers did not consider that the proposal was optimising the Site.

An updated design presentation was shared with Officers at the meeting on 04.06.2019. Whilst this was not shared in hard copy, it showed a taller scheme at the Site. Officers consider that a taller scheme could be delivered at this Site. Specifically, buildings in excess of 10 storeys could be delivered towards the rear of the Site, closest to the existing taller hospital buildings. This is subject to high quality design, which promotes high levels of sustainability and which helps to raise the standard of design more generally in the area.

Officers will support proposals that optimise Sites, in line with National Planning Policy guidance. Proposals must demonstrate how the density of development would contribute towards maintaining and enhancing the visual character and appearance of the wider townscape and lead to no net loss of biodiversity. A Landscape and Visual Impact Assessment would be required to support an application.

In summary, the Site presents an opportunity for great optimisation. A tall scheme is considered appropriate, subject to high quality design, which promotes high levels of sustainability and which helps to raise the standard of design more generally in the area.

Affordable Housing

Paragraph 8.6 of the Revised Developer Contributions Supplementary Planning Document (2014) sets out that the Council will apply Policy CS9 to open market sheltered or extra care housing.

Policy SC9 sets out that residential development of 15 or more dwellings gross (or on sites of 0.5ha or above) should include at least 40% of dwellings as affordable.

The proposal is subject to the provision of affordable housing. The submitted documentation does not identify whether the scheme will or will not deliver at least 40% affordable dwellings; however the applicant is strongly advised to comply with this policy requirement in any future Planning Application. There is an acute need for affordable housing within the Borough, particularly social rented accommodation. The provision of key worker housing is encouraged.

In the event that the development does not provide 40% affordable housing, a Viability Assessment would be required.

In summary, the scheme is subject to affordable housing provision. The applicant is strongly advised to comply with the policy requirement in any future Planning Application. In the event that the development does not provide 40% affordable housing, a Viability Assessment would be required.

Access, Parking and Cycle Parking

Policy CS16 encourages development proposals to foster an improved and integrated transport network and facilitate a shift of emphasis to non-car modes as a means of access to services and facilities. Development proposals will be required to (inter alia) minimise the need for travel, be appropriate for the highways network, provide appropriate and effective parking provision (both on and off-site) and ensure that vehicular traffic generated does not

create new or exacerbate existing on street parking problems, nor materially increase other traffic problems.

Policy DM37 and Annexe 2 (Parking Standards for new development) sets out car parking standards and cycle parking standards. The Council will consider exceptions to policy requirements if the applicant robustly demonstrates that the level of on-site parking associated with a proposal would have no harmful impact on the surrounding area in terms of street scene or the availability of on-street parking.

The Site is well connected. Epsom Train Station is located approximately 1.2 kilometres to the North-East of the Site. There are a number of bus stops located on Woodcote Green Road.

The proposal seeks an automated parking system and electric charging stations. A total of 150 automated residents car parking spaces are proposed and 20 visitor car parking spaces. The applicant is required to also provide on-site cycle parking.

The applicant is strongly advised to engage in formal pre-application discussions with SCC Highway Authority, in advance of submitting a formal application. Any planning application should be accompanied by a Transport Assessment and the Council will take advice from SCC Highway Authority during the course of a formal application.

In summary, the Site is well connected, with Epsom Train Station located in close proximity to the Site and a number of bus stops located on Woodcote Green Road. The proposal seeks 150 automated residents' car parking spaces and 20 visitor car parking spaces. Although officers find this solution to be innovative and potentially a good way to address car parking on Site, how this scheme would work and the future proofing of this should the technology become obsolete, should be robustly justified within a future Planning Application. The applicant is required to also provide on-site cycle parking. The applicant is strongly advised to engage in formal pre-application discussions with SCC Highway Authority, in advance of submitting a formal application.

Landscaping and Biodiversity

Policy SC3 sets out that development that is detrimental to the Borough's biodiversity will be minimised, and where it does take place, adequate mitigating measures should be provided. Wherever possible, new development should contribute positively towards the Borough's biodiversity.

Policy DM4 sets out that development affecting any site or building that supports species protected by Law, including their habitats, will only be permitted if appropriate mitigation and compensatory measures are agreed to facilitate the survival of the identified species, keep disturbance to a minimum and provide adequate alternative habitats to ensure no net loss of biodiversity. Whether or not there are any species or habitats that enjoy statutory protection, every opportunity should be taken to secure net benefit to the Borough's biodiversity. To this end, an assessment of the existing nature conservation assets on a development site should be undertaken at the application stage and suitable biodiversity enhancements proposed.

Policy DM5 sets out that the Borough's trees, hedgerows and other landscape features will be protected and enhanced by (inter alia) requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include the planting of new semi-mature trees and other planting.

Development should contribute positively towards the Borough's biodiversity. A landscape proposal would be required as part of a future planning application at the Site, which should

retain existing landscape features where practicable and include the planting of new semi-mature trees and other planting. An area of green open space is located to the South of Woodcote South Road and the applicant is encouraged to enhance this area, in line with any proposal at the Site.

In summary, development at the Site should contribute positively towards the Borough's biodiversity. A landscape proposal would be required as part of a future planning application at the Site and the applicant is encouraged to enhance the open public green space to the south of Woodcote Green Road as part of the proposal.

Conclusion

Local Planning Policy seeks to retain or secure an appropriate level of community infrastructure provision to meet the needs of its evolving population. Any future Planning Application would be required to robustly demonstrate that there is no longer a need for the existing community facilities in their current use, or in any other form of community use, or that there is an appropriate alternative means of providing equivalent facilities.

The provision of C2 Use development at the Site is likely to be acceptable, subject to the applicant satisfying the requirements set out in Policy DM21. A future Planning Application must provide robust evidence, demonstrating a need for this type of accommodation within the Borough, evidence that it will not result in an over-provision of such accommodation and that the design of the proposal is flexible enough to readily accommodate conversion to other appropriate uses.

A tall contemporary scheme of in excess of 10 storeys is considered appropriate at this Site, subject to high quality design, with great weight to be given to outstanding or innovative designs. Any proposal should assimilate with its surroundings and ensure that there is no adverse impact on adjacent residential amenity.

Officers consider that the proposals present an opportunity for further Site optimisation and the applicant is encouraged to continue to engage with Officers in a formal Planning Performance Agreement (PPA).

The Planning Application Process

Should you wish to submit an application, you would be required to submit a planning statement and robust supporting documentation with your planning application. The Council will make every effort to ensure that the advice given in the pre-application process is as accurate as possible. However any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to any future planning applications and, whilst it may be a material consideration, it cannot be held to bind the Council in its formal determination of a subsequent application.

It should be noted that the weight given to pre-application advice notes will decline over time. Advice for schemes submitted more than 1 year after the date of issue will not be valid. Please do not hesitate to contact the relevant case officer to discuss any points raised above.

Yours faithfully

Ginny Johnson
Planning Officer
Epsom & Ewell Borough Council