



Appeal on Behalf of Guild Living

Epsom General Hospital, Dorking Road, Epsom KT18 7EG

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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Appendix A	Glossary (to the rear of this proof)
Appendix B	TVIA Methodology (to the rear of this proof)

Appendices C-F Various (see separate A3 document)

Appendix C	Historic Mapping
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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. Since gaining my first degree and post graduate diploma in Landscape Architecture from the University of Central England in 1996 I have worked as a landscape architect for Lovejoy in Birmingham becoming Design Director in 2005. I gained a postgraduate diploma (distinction) in Urban Design from Oxford Brookes University in early 2005. I was appointed Managing Director of Capita Lovejoy's Birmingham Office in 2008. In March of 2011 I, along with my colleague Mark Rose, founded Define, which has since grown to around 22 professional staff (including town planners, urban designers, landscape architects and architects).
- 1.1.3. All of my professional work as a landscape architect and urban designer has been at the interface between development and its context, often in locations that are sensitive due to their landscape, townscape and visual qualities.
- 1.1.4. Current projects I am involved in include being the lead designer/masterplanner for Garden Cities (such as Ebbsfleet Eastern Quarry), Garden Towns (such as Worcestershire Parkway), Garden Villages (numerous) and Garden Suburbs (such as Broadnook Garden Suburb).
- 1.1.5. I also specialise in the design and assessment of a wide range of urban regeneration and townscape development projects, where a key factor in the project's success is how the design responds positively to its townscape and visual setting. I am currently acting, or have recently acted, on a wide range of projects of a similar nature to, and scale of, the appeal scheme(s) in Bristol, Birmingham, Cambridge, Exeter, Glasgow, High Wycombe, a variety of London Boroughs, Leeds, Manchester, Oxford, Sheffield, Tunbridge Wells and Windsor.
- 1.1.6. I have audited in excess of 200 schemes, either during their determination or following refusal, and have given evidence at over 80 planning appeals.
- 1.1.7. I am very familiar with the townscape and visual assessment process, and acted on behalf of the Landscape Institute in providing 'masterclasses' to LI members, alongside the author of GLVIA when the third edition was launched in 2013, as well as presenting a variety of seminars on townscape and visual impact assessment.
- 1.1.8. 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);

1.2.3. My evidence is therefore structured as follows

Section 2 considers the policies and guidance referred to in the reason for refusal, highlighting key aspects of particular relevance to this appeal.

Section 3 provides a brief description of the site and the proposed developments (Appeal A and B).

Section 4 sets out a summary of the townscape and visual baseline.

Section 5 assesses the townscape and visual effects arising from Appeal A.

Section 6 assesses the townscape and visual effects arising from Appeal B.

Section 7 considers the ability to deliver landscape benefits to the Woodcote Green Road boundary.

Section 8 provides conclusions.

1.2.4. A Townscape and Visual Impact Methodology is provided to the rear of this A4 document at Appendix A.

1.2.5. A separate A3 appendix contains Appendices B – F.

Appendix B provides historic mapping to show how the site and its context has evolved.

Appendix C provides detailed Townscape Baseline Assessment sheets to explain the character and sensitivity of the respective Townscape Character Areas.

Appendix D identified the representative viewpoints chosen to assess the visual effects (with reference to CD8.7)

Appendix E includes detailed assessment sheets that consider the townscape and visual effects of the proposed appeal schemes A and B.

Reference to Miller Hare's visualisations is made in my evidence – these are found within the 'Key Images Bundle' held at CD8.7.

1.2.6. A summary proof of evidence is provided separately.

1.2.7. Separate evidence is provided by Tim Spencer in respect of Planning, Andrew Earwicker in respect of the scheme design and Matthew Serginson for Guild Living..

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

1.2.8. Finally, this proof of evidence provided for this appeal is true and has been prepared and is given in accordance with The Landscape Institute Code of Conduct. I confirm that the opinions expressed are my true and professional opinions.

2. POLICY AND GUIDANCE

2.1. Introduction

- 2.1.1. This section of my evidence summarises the most relevant parts of key national and local policies and guidance only in relation to townscape matters. Refer to the proof of evidence of Tim Spencer for a full overview of the relevant planning policies.

2.2. National Policy

National Planning Policy Framework (February 2019)

- 2.2.1. Paragraphs 122 and 127 of the NPPF are referred to in the first reason for refusal, and these sections relate to how policies and decisions make effective use of land and shape well-designed places that are sympathetic to local character and history.
- 2.2.2. I would draw specific relevance in my evidence to the current notable difference between the appeal site and its surroundings, and thus the desirability of maintaining an area's prevailing character does not translate directly to this situation.

2.3. National Guidance

National Design Guide (October 2019, updated January 2021)

- 2.3.1. The National Design Guidance was recently updated to be fully aligned with the new draft Model Design Code. This document sets out the ten characteristics of a well-designed place, and the first three relate to 'character' - these being Context, Identity and Built form.
- 2.3.2. The most relevant principles of these three sections are:
- C1 - Understand and relate well to the site its local character and wider context, enhancing positive qualities and improve negative ones.
 - C2 - Value local heritage, local history and culture, well designed places and buildings are influenced positively by the local vernacular.
 - I1 - Respond to existing local character and identity, most places have some positive elements of character that can help inform the character of new development.
 - I2 - Well-designed, high quality and attractive places and buildings, this may include adopting typical building forms, architectural precedents, local features and a positive and coherent identity.
 - I3 - Create character and identity, character started to be determined by the siting of development, its layout and grain, and form, scale, proportions, design, materials..etc to create a coherent identity.
 - B2 - Appropriate building types and forms that relate well to the site, context, identity and character.

- 2.3.3. It must be recognised that a number of the above principles are based on there being a degree of consistency between the character of the site and its context, and the desirability of maintaining or enhancing this consistency. That is not the case in this appeal. The appeal site, and indeed the wider Epsom Hospital site, notably contrasts with the suburban residential character of its context.
- 2.3.4. In respect of Epsom Hospital, this has been the case since at least 1869, when the first available OS maps illustrates the contrast between the Hospital (or then the Union Workhouse) and the residential area of Chalk Lane (see Figure 1A – my Appendix B page 4). Indeed, this relationship appears on the first Tythe Map (1838) and is likely to have extended back to the 1700s. In respect of the appeal site, this contrast has been evident since at least 1961 (see Figure 1C – my Appendix B page 6) and the Appeal A HTVIA (CD1.3.14) makes clear (at pages 10 and 11) that this contrast was triggered by the appeal site becoming the location of a new nurses home and ancillary accommodation in the late 1930's.
- 2.3.5. This notable contrast in character between the appeal site and its context is therefore well established, and the principles contained in the National Design Guide should be read in this context, as in some cases alignment with them would be inappropriate and conflict with other planning policy objectives.

2.4. Local Policy - Epsom Core Strategy (2007)

- 2.4.1. Policy CS5 identifies that high quality and inclusive design will be required. It sets out three criteria that development should meet, such as creating attractive environments, reinforce local distinctiveness and make efficient use of land.

2.5. Local Policy - Epsom Development Management Policies Document (2015)

- 2.5.1. Policy DM9 seeks townscape enhancement, particularly areas with poorer quality and where character has been eroded. Proposals will be assessed for their positive contribution, including compatibility with local character, the surrounding environment, the setting of the proposal site and its relationship with it, and the inclusion of local features and materials.
- 2.5.2. Policy DM10 requires development to incorporate principles of good design. This explains that the most essential or contributing aspects of local character should be respected, maintained or enhanced, with examples listed. This policy also sets out a list of more specific requirements (none of which specifically or directly relating to townscape related factors).
- 2.5.3. Policy DM11 addresses housing density, supporting making the most efficient use of land whilst demonstrating how the density of development would maintain and enhance the visual character and appearance of the wider townscape. This policy suggests a ceiling of 40 dwellings per hectare, subject to a number of exclusions, including where the townscape has capacity to accommodate higher levels.
- 2.5.4. Policy DM13 (Building Heights) is not referred to in reason for refusal one, but is addressed here for completeness. It identifies a limit of 12 metres height for buildings outside of the Town Centre. This fixed requirement does not take into consideration the existing height of buildings within the hospital site, and therefore I consider the most relevant test of this

policy is to whether the appeal scheme leads to unacceptable townscape and visual effects, as controlled by DM9-11 as set out above.

2.6. Conclusion

- 2.6.1. 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.
- 2.6.2. Understanding local character is a key first step, with design decision shaped in response to the existing townscape and visual qualities of the site and its context to create enhancements. Appreciating what features are most essential to local character is identified to establish how development should respond to this (respect, maintain or enhance).

3. DESCRIPTION OF THE APPEAL SITE AND SCHEMES

3.1. Introduction

3.1.1. This section does not attempt to repeat the description of the development of the site as set out in sections 2 and 3 of the Statement of Common Ground. Instead, it focuses on the townscape related aspects that are referenced in subsequent sections.

3.2. Appeal Site

3.2.1. The appeal site is around 1.55 hectares in size and comprises:

1. The unused and partly derelict four storey Rowan House that addresses Woodcote Green Road (18.4m high, 69.5m x 54.8m).
2. The three storey Woodcote Lodge providing doctors and nurse accommodation (10.8m high, 33.5m x 13.9m).
3. The now demolished Beacon Ward (which was a single storey 538m² building) now used as a car park.

3.2.2. Epsom Hospital lies to the immediate north, north-west and north east of the appeal site and its closest buildings to the appeal site include:

1. Langley Wing, a predominantly 3 storey brick building to the north-west with a footprint of around 118m x 40m.
2. Wells Wing, a substantial 5 storey high building of around 21 metres height, with a central built projection to a height of around 28.7 metres (with plant protruding above this height). This building has a concrete with painted white brick panels façade and is noticeable in the local townscape. Its building footprint is around 88m x 34m.
3. Day Surgery (single storey building of around 26m x 14m) and Denbies Wing (a 4-5 storey attached wing of the main hospital entrance) sit to the north of the appeal site, partly tucked in behind Woodcote Wing to the east.
4. Woodcote Wing is a 2 and 3 storey building partly set back from Woodcote Green Road behind a surface car park, and is partly set back behind no's 20-28 Woodcote Green Road to its east. Its building footprint is around 91m x 12m.

3.2.3. The appeal site also has a boundary with adjacent residential properties, including 40 and 46 Woodcote Green Road, and 14 to 28 Dibden Rise and 7 Hylands Road.

3.3. Scheme Design - Appeals A and B

3.3.1. 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.

3.3.2. 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.

3.3.3. Scheme A is described in detail in the submitted Design and Access Statement and Statement of Common Ground. It was varied through Wheatcroft Amendments made in June 2021 which made a number of changes that was more aligned with Scheme B.

3.3.4. The principal changes to align Appeal A with Appeal B are:

1. An increased set back of Buildings A and B to Woodcote Green Road with an increased landscape treatment to this street edge.
2. Building A has a 'sawtooth' façade treatment to avoid harm to residential amenity.
3. Re-design of the western boundary landscape design and parking layout.
4. Central plaza design refinement to respond to additional Building B set back.
5. Sensory (podium) garden including for a hedge set back.
6. Material changes to building facades to become lighter / warmer / less contemporary.
7. Building B lift core to access garden roof terrace.
8. Total number of tree planting increased to 113no.

3.3.5. The principal townscape differences between Appeal A and Scheme B are:

1. Building A and Building B are proposed to be 9 storeys at their highest points in Appeal A and 8 storeys in Appeal B, with Appeal B having a further height reduction through reduced floor to ceiling heights.
2. Building A also reduced to five storeys at its Woodcote Green Road extent in Appeal A, whilst Appeal B reduces to 4 storeys, again with Appeal B having a lower floor to ceiling height.

3.4. Conclusion

3.4.1. 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.

3.4.2. 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.

3.4.3. The Appeal Site also abuts a number of 2 storey residential properties on Woodcote Green Road, Digdens Rise and Hylands Road.

3.4.4. 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.

3.4.5. I set out below 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

4. TOWNSCAPE AND VISUAL BASELINE

4.1. Introduction

- 4.1.1. I have reviewed the submitted Heritage, Townscape and Visual Impact Assessment of both Appeal A and B, and have reviewed Epsom's Evidence base, which contains an Environmental Character Study (ECS) that is of direct relevance to the townscape and visual baseline of the area (see CD4.13).
- 4.1.2. I consider both of these sources of information below in conjunction with my own site visits and assessments. These are set out in more detail at Appendix B, which shows the historic maps of the study area with the townscape character areas overlaid, and Appendix C, which provides new townscape character assessment sheets to test the appropriateness of the TCA boundaries and to identify their value, susceptibility and overall sensitivity to the change proposed by Appeal A and Appeal B.
- 4.1.3. My Appendix E sets out a townscape and visual impact assessment schedule for both Appeal A and Appeal B, which sets out in a format that is consistent with GLVIA3², my judgements of townscape and visual baseline that I describe further below. My appendices C and F therefore provide further detail to the summaries provided below.
- 4.1.4. I consider afresh the various townscape and visual receptors, focusing on those within around 500 metres of the Appeal site, as this is a reasonable study area that includes all notable effects and only summarise below the value, susceptibility and overall sensitivity of these townscape receptors to the type of change proposed.
- 4.1.5. I conclude with a comparison of the judgements made in the Environmental Character Study, the HTVIA and my assessment as to the relative sensitivity of the townscape and visual receptors to the type of change being proposed.

4.2. Townscape Baseline

Epsom 2008 Environmental Character Study (ECS – see CD4.13)

- 4.2.1. This Study that forms part of the Council's published evidence base identifies a variety of townscape character areas, as identified at Figure 2. It goes on to assess the generic sensitivity of the Townscape Character Areas, although this is not specific to a type of change, or where it might occur within the respective TCA. This point is central to the different overall sensitivity judgments I have compared to the ECS (see Table 4 at page 16 below).
- 4.2.2. I set out a summary below of the TCAs identified within the ECS I have identified as having the potential to be affected by Appeal schemes A and B, with a summary of my assessment of their value, susceptibility to the type of change being proposed at this Appeal and the overall sensitivity, following the methodology set out at Appendix A, in accordance with the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (IEMA and LI 2013). Further detail is provided at Appendix C.

² Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (IEMA and Landscape Institute, March 2013)

Townscape Character Area 34 – Avenue Road / Heathcote Road / Ashley Road

4.2.3. This TCA is located to the east of the Appeal site, and north of Chalk Lane Conservation Area, and includes the Epsom Sports, Hockey and Cricket Clubs (within the Schnadhorst Memorial Ground).

4.2.4. I consider the susceptibility to be **low**, the value to be **medium-high**, and the overall sensitivity to the type of change being proposed by Appeals A and B to be **medium**.

Townscape Character Area 35 – Dorking Road / Oakmead Green / Elmslie Close

4.2.5. This TCA covers a wide area that has an eclectic and inconsistent character, hence there are a wide number of sub-character areas, and it varies notably in its value (with some small pockets of high value amongst a mainly low value townscape).

4.2.6. I consider the susceptibility to be **medium**, the value to be low-**medium** and the overall sensitivity to the type of change being proposed by Appeals A and B to be low-**medium**.

Townscape Character Sub-Area 35A – Whitehorse Drive / Elm Grove / Dudley Grove

4.2.7. This TCA is a small sub component of TCA 35 and lies to the north of the main Epsom Hospital site and Dorking Road. It has a more consistent character that is typically found for the wider TCA 35, with detached and semi-detached dwellings addressing small scale streets with on-street parking.

4.2.8. I consider the susceptibility to be **low-medium**, the value to be **medium**, and the overall sensitivity to the type of change being proposed by Appeals A and B to be **low-medium**.

Townscape Character Sub-Area 35E – Epsom Hospital

4.2.9. This TCA is also a sub-component of TCA 35. It includes the appeal site and Epsom Hospital site, and I consider that it incorrectly includes numbers 40-46 Woodcote Green Road within its area - all of which have far more in common with other properties along Woodcote Green Road (TCA36). I recognise that these buildings have historically always been in close physical proximity with the evolving adjacent hospital buildings – when they were first built smaller scale buildings did exist within the hospital site in 1938, but the adjacent hospital site almost immediately changed to provide nurses accommodation³. Notwithstanding this historic evolution, I consider that in townscape terms the existing buildings very closely relate to TCA 36 (and not to TCA 35E). I agree, however, with the Environmental Character Study in that this sub-area is visually incongruous, buildings are much larger than the surrounding area, it is discordant with its surroundings, is in poor condition, and has a low townscape quality.

4.2.10. I consider the susceptibility to be **low**, the value to be **low**, and the overall sensitivity to the type of change being proposed by Appeals A and B to be **low**.

³ See my Figure 1C in combination with the Appeal A HTVIA (CD1.3.14) pages 10 and 11

**Townscape Character Area 36 – Woodcote Park Road / Hylands Road / North
Woodcote Green Road**

4.2.11. This TCA predominantly lies to the west of the Appeal site and includes a variety of typically 2 storey residential dwellings arranged in detached and semi-detached form. I consider that this TCA should include 40-46 Woodcote Green Road (for the reasons expressed at 4.2.9 above) as well as 6-28 Woodcote Green Road, which appears to not be located within any of the TCA boundaries in the evidence base. I consider this a logical place for these properties as their typology, and in some cases almost exact semi-detached housetypes, are repeated across this TCA.

4.2.12. I consider the susceptibility to be **medium**, the value to be **medium**, and the overall sensitivity to the type of change being proposed by Appeals A and B to be **medium**.

Townscape Character Area 37 – Woodcote Estate / Sunny Bank / Chantry Hurst

4.2.13. This TCA lies to the south of the Appeal Site and is formed by the private Woodcote Estate. It has a strong consistency across the area, and is predominantly detached with some semi-detached properties (as well as the converted Woodcote House). It also includes the Millennium Green open space and pond that sits on its northern boundary, along with a small pocket of woodland and informal footpaths that appear well used and valued.

4.2.14. I consider the susceptibility to be **medium**, the value to be **medium-high**, and the overall sensitivity to the type of change being proposed by Appeals A and B to be **medium-high**, mostly due to the direct relationship between the site and the Millennium Green.

Chalk Lane Conservation Area

4.2.15. This TCA is not identified in the Council's evidence base with a TCA references, due to its status as a Conservation Area and its townscape qualities are set out in a separate Conservation Area Appraisal.

4.2.16. The value of this townscape is **high**, but I find its susceptibility to the proposed change as being **low**. The CA's positive characteristics relate to its narrow lanes, boundary walls, variety of plot shapes and sizes, rural setting, parkland connecting to woodland and open fields and its prestigious houses. The proposed change will only be visible at the northern extent of this Conservation Area and hence this townscape has a **low** susceptibility and therefore a **medium** overall sensitivity.

4.2.17. I summarise my overall assessment of the townscape sensitivity at Table 2 below.

Table 2 – Townscape Sensitivity Summary

Townscape Receptor	Susceptibility	Value	Sensitivity
TCA 34	Low	Medium-High	Medium
TCA 35	Medium	Low-Medium	Low-Medium
TCA 35A	Low-Medium	Medium	Low-Medium
TCA 35E	Low	Low	Low

TCA 36	Medium	Medium	Medium
TCA 37	Medium	Medium-High	Medium-High
Chalk Lane CA	Low	High	Medium

Submitted HTVIA

4.2.18. The submitted HTVIA for Appeal A (January 2020) and Appeal B (February 2021) set out a range of townscape receptors at its pages 42/43 and 43/44 respectively (see CD1.3.14 and CD2.2.21). This lists the townscape receptors and summarises their overall sensitivity. Having reviewed the methodology applied, these judgements are based on the quality and value of the townscape receptor, not its ability to accommodate the proposed change without undue change to its baseline condition⁴.

4.2.19. The townscape receptors and their overall sensitivity is (as per page 42/43 of Appeal A's HTVIA and pages 43/44 of Appeal B's HTVIA (which have the same judgments) are:

- | | |
|---------------------------------------|-------------------------|
| 1. Chalk Lane Conservation Area | High Sensitivity |
| 2. Woodcote Conservation Area | Medium/High Sensitivity |
| 3. Millennium Green | Medium Sensitivity |
| 4. Schnadhorst Memorial Ground | Medium Sensitivity |
| 5. Dorking Road | Low/Medium Sensitivity |
| 6. Digdens Rise / Woodcote Green Road | Low/Medium Sensitivity |
| 7. Stamford Green Public Open Space | High Sensitivity |

4.2.20. I compare the conclusions the HTVIA reached in respect of townscape sensitivity in my conclusions below (alongside the ECS's conclusions) to avoid confusion. There are some differences between the receptors chosen and the judgments made, but this is largely explained by methodological differences, but for the avoidance of doubt I rely entirely on the judgments I set out at Table 1 above and explained in Appendices C and F.

4.3. Visual Baseline

HTVIA

4.3.1. The Heritage, Townscape and Visual Impact Assessment (for both Appeal A – January 2020 and Appeal B – February 2021) sets out 15 visual receptors and assesses their sensitivity.

4.3.2. A number of these receptors are more than one viewpoint of a single receptor (a receptor being a person who experiences a view, usually in a kinetic manner). The methodology of assessing visual sensitivity does not specifically combine judgments on value and susceptibility as required by GLVIA3, but the methodology does consider both of these

⁴ This is the test of 'susceptibility' as set out in GLVIA3 at its paragraph 5.40. GLVIA3 described sensitivity to a type of change as being a combination of the receptors value and susceptibility (GLVIA3 para 5.39)

aspects in coming to its conclusion.

4.3.3. Its conclusions are summarised below:

- | | |
|---|--------------------|
| 1. Viewpoint 1 Woodcote Millenium Green | Low Sensitivity |
| 2. Viewpoint 2 Chalk Lane Conservation Area | Low Sensitivity |
| 3. Viewpoint 3 Chalk Lane Conservation Area | Medium Sensitivity |
| 4. Viewpoint 4 Chalk Lane Conservation Area | Medium Sensitivity |
| 5. Viewpoint 5 Chalk Lane Conservation Area | Low Sensitivity |
| 6. Viewpoint 6 Woodcote Conservation Area | Low Sensitivity |
| 7. Viewpoint 7 Woodcote Conservation Area | Low Sensitivity |
| 8. Viewpoint 8 St Joseph's Catholic Church | Medium Sensitivity |
| 9. Viewpoint 9 Dorking Road | Low Sensitivity |
| 10. Viewpoint 10 Dorking Road | Medium Sensitivity |
| 11. Viewpoint 11 Woodcote Green Road | Low Sensitivity |
| 12. Viewpoint 12 Woodcote Green Road | Low Sensitivity |
| 13. Viewpoint 13 Epsom Racecourse | Medium Sensitivity |
| 14. Viewpoint 14 Hook Road Car Park | Low Sensitivity |
| 15. Viewpoint 15 Stamford Green Cons Area | Medium Sensitivity |

AW Evidence

4.3.4. I have separately reviewed the likely visibility of the scheme and its key visual receptors (i.e routes and places from which local people, residents and visitors will see the proposed schemes) and have as a result reduced the number of visual receptors to the groups set out below to focus on the people and their visual experiences that are most likely to be affected by the proposed changes.

1. Group 1 – Users of Woodcote Green Road (pedestrians, cyclists and vehicles, with some resident views) represented by HTVIA viewpoints 2 and 11
2. Group 2 – Users of the Millennium Green Open Space (pedestrians only) represented by HTVIA viewpoint 1
3. Group 3 – Users of Chalk Lane / Woodcote Green Road / Woodcote Road within the Chalk Lane Conservation Area (pedestrians, cyclists and vehicles, with some resident views) represented by HTVIA viewpoint 3
4. Group 4 – Users of St Joseph's Catholic Church (pedestrians, cyclists and vehicles) represented by HTVIA viewpoint 8
5. Group 5 – Users of Dorking Road (pedestrians, cyclists and vehicles, with some

resident views) represented by HTVIA viewpoint 9

4.3.5. I have also assessed the value, susceptibility to change and overall sensitivity of the visual receptor groups (see Appendix C and F) and summarise these at Table 3 below.

Table 3 –Visual Sensitivity

Receptor Group	Viewpoint Ref	Susceptibility	Value	Sensitivity
Group 1	2 and 11	Low-Medium	Low-Medium	Low-Medium
Group 2	1	High	Medium	Medium-High
Group 3	3	Medium	Low	Low-Medium
Group 4	8	Medium	Medium	Medium
Group 5	9	Low	Low	Low

4.4. Conclusion

4.4.1. 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 area's overall sensitivity to received development within the parcel.

4.4.2. This ECS forms an appropriate basis to consider the townscape baseline of the site and its context. My Appendix B and C considers how the townscape areas identified relate to the historic growth of the area, and then assess each townscape area in turn. I broadly agree with the ECS, with minor comments in respect of precise boundaries, and have used this for the basis to assess the sensitivity of the townscape areas to the appeal schemes (and not generic sensitivity). Inevitably there are some differences in our conclusions, as those townscape areas farther away from the proposed change are less susceptible to the change proposed, but they are broadly aligned.

4.4.3. I have also considered the submitted HTVIAs (January 2020 for Appeal A and February 2021 for Appeal B) and found that this does not use the ECS for its townscape receptors and has a different methodology that is not wholly aligned with GLVIA3. As a result, I have conducted my own assessment (see Appendix C and F) and set out below a summary of the townscape receptors and sensitivity, highlighting how it compares to the ECS and the submitted HTVIAs.

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	

4.4.4. 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 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. The HTVIA methodology is not wholly aligned with GLVIA3 methodology, in that the nature of the receptor / viewer is the primary consideration to inform sensitivity judgments, and so some differences do occur, in particular the viewpoint from the Millennium Green (Group 2).

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

4.4.5. 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.

5. APPEAL A – TOWNSCAPE AND VISUAL EFFECTS

5.1. Introduction

- 5.1.1. This section summarises my assessment of the townscape and visual effects arising from Appeal A and should be read in conjunction with Schedules 1/1A and 2 of Appendix E and also the Key Images Bundle which contain visualisations of the baseline, the original Appeal A scheme, the Wheatcroft Amendments and the Appeal B scheme (see CD8.7).

5.2. Townscape Effects

- 5.2.1. I set out below my summary of the townscape effects arising from Appeal A, focusing on the effects at completion and maturity stages (as those effects at construction stage inevitably create short term adverse effects due to the visible presence of cranes and construction activities).

Townscape Character Area 34 – Avenue Road / Heathcote Road / Ashley Road

- 5.2.2. The Appeal A scheme is both visually and physically separate from this TCA and the effects are therefore in-direct and relate to the perception of its townscape character, which does to some degree relate to its context, and changes within that context. In this case, the Hospital site includes open land to its eastern edge that maintains clear separation from the appeal scheme, and appreciation of the proposed changes from most locations within this TCA will be predominantly negligible, aside from the Sports Ground where it is low.
- 5.2.3. In combination with the baseline assessment, the effect on this TCA is **slight and neutral to no effect** at completion and at maturity.

Townscape Character Area 35 – Dorking Road / Oakmead Green / Elmslie Close

- 5.2.4. Similarly, at no point is TCA 35 directly affected by Appeal A scheme, and the townscape addressing Dorking Road is separately from it by the large Epsom Hospital site, which notably reduces the potential effects upon it due to its physical and visual separation.
- 5.2.5. In combination with the baseline assessment, the effect on this TCA is **slight and neutral to no effect** at completion and at maturity.

Townscape Character Sub-Area 35A – Whitehorse Drive / Elm Grove / Dudley Grove

- 5.2.6. The appeal scheme has a negligible effect on this TCA and therefore Appeal A scheme creates **no townscape effect** upon it.

Townscape Character Sub-Area 35E – Epsom Hospital

- 5.2.7. Due to the incongruous and disjointed form and appearance of the existing Hospital site, as set out in more detail within the ECS, I find the Appeal A scheme to create a notable improvement to its character (although the scale of magnitude of this benefit is reduced to slight by this TCA's low sensitivity / high ability to receive this type of change), leading to a **slight beneficial** effect at completion and maturity.

Townscape Character Area 36 – Woodcote Park Road / Hylands Road / North Woodcote Green Road

5.2.8. The Appeal A scheme forms a notable back drop to this TCA from a (relatively small) number of locations within it immediately adjacent to the site. Notwithstanding the low geographic extent of this effects, I consider the presence of taller urban form, even with a very positive architectural approach and sensitive use of materials, to slightly change the perception of its townscape character, and it therefore has a **slight adverse** effect on this TCA at completion and at maturity.

Townscape Character Area 37 – Woodcote Estate / Sunny Bank / Chantry Hurst

5.2.9. The Appeal A scheme's relationship with this TCA is largely with its northern edge, which includes woodland, footpaths and the Millennium Green open space and pond. The Appeal A scheme has notable benefits for this TCA, it provides a positive frontage to Woodcote Green Road, a wide landscape corridor that provides for a range of street trees and associated landscape, and a sensitive use of materials to fit successfully into its built context. However, I find that these benefits are to some degree counter balanced by the appreciation of increased building mass behind the immediate Woodcote Green frontage, and as such consider the overall effect at completion and maturity to be **moderate and neutral**.

Chalk Lane Conservation Area

5.2.10. The Appeal A scheme's relationship with this TCA is restricted to some views from its northern extent. There is no direct change to this TCA and there is little to no perception of change (in a similar way to TCA34). In simple terms the appeal site and Epsom Hospital has included taller buildings of far greater mass than can be found in this CA since the 1800s. Therefore, whilst the proposed change is visible to some degree to the northern extent of this CA, it does not change the perception of this TCA's attributes and I consider the overall effects to be **slight and neutral**.

5.2.11. In summary, therefore, I find that Appeal A scheme gives rise to predominant slight and neutral effects, the exceptions being to the Epsom Hospital site (TCA 35E), which receives a slight and beneficial effect, and TCA 36, which received a slight adverse effect.

5.3. Visual Effects

5.3.1. I set out below a summary of the visual effects arising from Appeal A, with reference to Schedule 2 of Appendix E.

Group 1 – Users of Woodcote Green Road

5.3.2. This receptor group relates to viewpoints 2 and 11, which lie between 148 and 187 metres from the closest proposed building. This receptor does also represent a wide range of views where the proposal scheme will either not be visible, or would be visible to a limited

degree. However, these representative viewpoints rightly represent the worst-case visual experience and as such I consider the effect at completion and maturity to be **adverse and moderate** predominantly due to the high scale of change in the view and its medium contrast in the view.

Group 2 – Users of the Millennium Green Open Space

5.3.3. This receptor group relates to viewpoint 1 within the Millennium Green area, and it should be noted that it is the worst-case position for views representing this receptor (with many other views being oblique to the change or within woodland). I consider the Scheme At completion and maturity to be to overall have a **substantial and neutral effect**. The Appeal scheme creates a number of positive visual changes – a positive edge to Woodcote Green Road and increased street trees and vegetation. These features are positively experienced for many of the views available of the proposed buildings within this receptor, particularly more oblique positions or viewpoints closer to Woodcote Green Road as the visibility of the taller parts of Buildings A and B will be less visible or not visible. For some of the viewpoints, the higher built form will be visible beyond the lower Woodcote Green Road frontage, and whilst these buildings have a positive appearance, the additional height is considered to reduce the overall effect to neutral.

Group 3 – Users of Chalk Lane / Woodcote Green Road / Woodcote Road within the Chalk Lane Conservation Area

5.3.4. I consider this visual receptor to receive a **moderate and adverse** effect. The proposed change will be visible above the semi-detached dwellings along Woodcote Green Road. Whilst the building's appearance and set back is a positive design response, and the building is certainly not experienced as an unattractive or detracting urban feature, the amount of building visible above the existing buildings leads to a conclusion that is finely balanced, but I consider to be adverse in nature, particularly from worst case positions. There will be a number of viewpoints within this receptor, however, where the effect is neutral in nature as the visibility of the proposed buildings will be reduced.

Group 4 – Users of St Joseph's Catholic Church

5.3.5. Due to the distance and that the proposed change is a small part of the view and set behind existing hospital buildings, I consider the appeal scheme to give rise to a **slight and neutral** visual effect at completion and maturity

Group 5 – Users of Dorking Road

5.3.6. Similarly, due to the intervening hospital buildings, the visual effect on this receptor at completion and maturity will be **slight and neutral**.

5.4. Policy Analysis

5.4.1. I consider below how my findings relating to townscape and visual effects relate to the

policies identified at my Section 2.

National Policy

- 5.4.2. I find that Scheme A does seek to optimise the use of what is an incongruous and unsightly part of the Epsom Hospital site. It promotes a positive architectural approach, shaping interesting internal spaces whilst responding favourably to its site edges in a way that is sympathetic to local character.
- 5.4.3. The positive architectural approach taken does result in positive effects and only a small number of adverse effects – largely slight adverse townscape effects on the adjacent housing (TCA 36) and moderate adverse visual effects from very localised parts of Woodcote Green Road and the Chalk Lane Conservation Area.
- 5.4.4. I recognise that urban regeneration schemes often have some adverse effects due to the contrast they have with their immediate surroundings (and the contrast between the existing site and its context is a noted feature that has a bearing on this assessment). These adverse effects can be construed as specific areas of non-policy compliance, although this point is worthy of more detailed consideration.
- 5.4.5. My analysis finds the effects on the local townscape is finely balanced, with many neutral or slight / no effects and a single slight adverse and slight beneficial effect, which broadly balance out as a neutral effect of slight magnitude.
- 5.4.6. In respect of visual effects, some moderate visual adverse effects are identified, and these are largely a result of the contrast between the scheme and its suburban context (as referred to above). These effects should be considered in the context that they are worst case assessments of views within the visual receptor (with many other views that are not adverse) and this should be given some weight.
- 5.4.7. In weighing up these detailed townscape and visual effects in the context of the intention of the NPPF, I do consider the appeal scheme complies with policies 122 and 127. It does seek to optimise the use of land and does make some changes to the townscape in which it is located and adjacent to as a result. The inevitable contrast between the appeal scheme (which has a significant contrast with its sub-urban context at present) can and does give rise to some adverse visual effects, but on balance I consider that the aspirations of policies 122 and 127 to be met in this context.

Local Policy - Epsom Core Strategy (2007)

- 5.4.8. Policy CS5 identifies that high quality and inclusive design will be required. I consider Scheme A to meet that test; it has a sensitive response to the site edges, promotes a character and appearance of development that is sympathetic to its context. As such, it does create an attractive development, reinforces local distinctiveness and makes efficient use of land.
- 5.4.9. As per my consideration of national policy above – some adverse effects do not directly translate as non-compliance with this policy, and in this case the townscape effects are on balance neutral and there are some adverse visual effects, largely due to the contrast in

some views between taller buildings and its sub-urban context. The unusual history and appearance of the appeal scheme is of relevance here. As explained above, the appeal site has notably contrasted with its immediate context for around 80 years and that will continue with the appeal scheme, with some adverse visual effects arising.

5.4.10. On balance, I therefore consider the appeal scheme to comply with this policy.

Local Policy - Epsom Development Management Policies Document (2015)

5.4.11. In respect of policy DM9, the Scheme A clearly takes the opportunity to enhance the low-quality townscape character of TCA 35E, resulting in a beneficial effect upon it. The scheme is compatible with local character largely through its material choice, but does result in some harmful visual effects that result not from the quality of the architecture, simply from its contrast with its context, leading to a built form that is larger and more visible than its context in some close range views. It is recognised that the appeal scheme does overall give rise to some adverse visual effects and does not fully comply with this policy. This is due to DM9 being more specific than the NPPF 127 and CS5 in requiring positive enhancement to visual character.

5.4.12. In respect of DM10, the Scheme A does incorporate principles of good design – it appropriately addresses key frontages, promotes a positive landscape treatment and uses an appropriate form of materials to reflect its context. However, due to the nature of the appeal site and its incongruity with its context, the appeal scheme should not seek to reflect the prevailing building typology, density, scale (as this would lead to a detached / semi-detached low rise building form), but it can and does respect the building line. I therefore consider the appeal scheme to meet this test.

5.4.13. In respect of policy DM11, the appeal scheme does make efficient use of land, and a 40 dwellings per hectare restriction placed upon it is wholly inappropriate due to the size and scale of the buildings on site – complying with this density ceiling would clearly in this case not lead to making efficient use of land and stop the scheme complying with that aspect of the Local Plan. Tim Spencer addresses this point in more detail in his proof of evidence.

5.4.14. Finally, in respect of policy DM13, the appeal site is a townscape anomaly due to it containing substantial buildings in a suburban context, with the existing buildings by far exceeding the 12 metre height restriction imposed by this policy. I do not consider this policy test to be appropriate to this site for this reason.

5.5. Conclusions

5.5.1. 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 6 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 and Neutral

5.5.2. 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 7 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

5.5.3. In terms of policy compliance, I find the Appeal A 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 adverse effects it gives rise to are largely due to the contrast between the scheme and the more suburban context of the site, which has been a feature of this site, Epsom Hospital and the local area for a very long time. 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, recognising that some adverse effects arise from the contrast between the Scheme And its suburban context and how this is experienced from viewpoints close to the site.

5.5.4. In respect of local policy, the scheme virtues are as set out above and this is aligned with policies DM9 and DM10, recognising that a minor conflict exists with DM9 in respect of the moderate adverse visual effects. I consider the townscape effects slight adverse and slight beneficial to broadly balance out to a point of neutrality. The visual effects should be considered in the context that they are worst case assessments of views within the visual receptor (with many other views that are not adverse) and this should be given some

weight. Clearly, adverse effects do not meet the policy test of DM10 in respect of respecting, maintaining or enhancing but the areas in which these tests are not provided are very limited, and in the context of the longstanding contrast between the site and its context, any policy breach must be considered to be minor.

5.5.5. 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.

6. APPEAL B – TOWNSCAPE AND VISUAL EFFECTS

6.1. Introduction

- 6.1.1. This section summarises my assessment of the townscape and visual effects arising from Appeal B and should be read in conjunction with Schedules 3/3A and 4 of Appendix E and also the Key Images Bundle which contain visualisations of the baseline, the original Appeal A scheme, the Wheatcroft Amendments and the Appeal B scheme (see CD8.7).

6.2. Townscape Effects

- 6.2.1. I set out below my summary of the Townscape effects arising from Appeal B, focusing on the effects at completion and maturity stages (as those effects at construction stage inevitably create short term adverse effects due to the visible presence of cranes and construction activities). This should be read in conjunction with Assessment Schedule 3 and 3A contained within Appendix E.

Townscape Character Area 34 – Avenue Road / Heathcote Road / Ashley Road

- 6.2.2. The Appeal B scheme is both visually and physically separate from this TCA and the effects are therefore in-direct and relate to the perception of its townscape character, which does to some degree relate to its context, and changes within that context. In this case, the Hospital site includes open land to its eastern edge that maintains clear separation from the appeal scheme, and appreciation of the proposed changes from within this TCA will be predominantly negligible, aside from the Sports Ground where it is low.
- 6.2.3. In combination with the baseline assessment, the effect on this TCA is **slight and neutral to no effect** at completion and at maturity.

Townscape Character Area 35 – Dorking Road / Oakmead Green / Elmslie Close

- 6.2.4. Similarly, at no point is TCA 35 directly affected by Appeal B scheme, and the townscape addressing Dorking Road is separately from it by the large Epsom Hospital site, which notably reduces the potential effects upon it due to its physical and visual separation.
- 6.2.5. In combination with the baseline assessment, the effect on this TCA is **slight and neutral to no effect** at completion and at maturity.

Townscape Character Sub-Area 35A – Whitehorse Drive / Elm Grove / Dudley Grove

- 6.2.6. The appeal scheme has a negligible effect on this TCA and therefore Appeal B scheme creates **no townscape effect** upon it.

Townscape Character Sub-Area 35E – Epsom Hospital

- 6.2.7. Due to the incongruous and disjointed form and appearance of the existing Hospital site, as set out in more detail within the ECS, I find the Appeal B scheme to create a notable improvement to its character, leading to a **slight beneficial** effect at completion and

maturity.

Townscape Character Area 36 – Woodcote Park Road / Hylands Road / North Woodcote Green Road

6.2.8. The Appeal B scheme forms a back drop to this TCA from a (relatively small) number of locations immediately adjacent to the site. Notwithstanding the low geographic extent of this effect, I consider the presence of taller urban form, with a very positive architectural approach and sensitive use of materials, to be balanced out by a form of proposed development that is notably different to this TCA, but assimilates relatively successfully into its context. As a result, I identify a **slight and neutral** effect on this TCA at completion and at maturity.

Townscape Character Area 37 – Woodcote Estate / Sunny Bank / Chantry Hurst

6.2.9. The Appeal B scheme's relationship with this TCA is largely with (this TCA's) northern edge, which includes woodland, footpaths and the Millennium Green open space and pond. The Appeal B scheme has notable benefits for this TCA, it provides a positive frontage to Woodcote Green Road, a wide landscape corridor that provides for a range of street trees and associated landscape, and a sensitive use of materials to fit successfully into its built context. Higher buildings are to some degree appreciated beyond the initial townscape frontage to Woodcote Green Road, however this does not undermine the benefits of the positive frontage and landscape elements. The overall effect at completion and maturity to be **moderate and beneficial**.

Chalk Lane Conservation Area

6.2.10. The Appeal A scheme's relationship with this TCA is restricted to some views from its northern extent. There is no direct change to this TCA and there is little to no perception of change (in the same way as TCA34). In simple terms the appeal site and Epsom Hospital has included taller buildings of far greater mass than can be found in this CA since the 1800s. Therefore, whilst the proposed change is visible to some degree to the northern extent of this CA, it does not change the perception of this TCA's attributes and I consider the overall effects to be **slight and neutral**.

6.2.11. In summary, therefore, I find that Appeal B scheme gives rise to predominant slight and neutral effects, the exceptions being to the Epsom Hospital site (TCA 35E), which receives a slight and beneficial effect, and TCA 37, which received a moderate beneficial effect.

6.3. Visual Effects

6.3.1. I set below a summary of the visual effects arising from Appeal B, with reference to Schedule 4 of Appendix E.

Group 1 – Users of Woodcote Green Road

6.3.2. This receptor group relates to viewpoints 2 and 11, which lie between 148 and 187 metres

from the closest proposed building. This receptor does include a wide range of views where the proposal scheme will either not be visible, or would be visible to a limited degree. However, these viewpoints demonstrate that even in these worst-case locations, the proposed development assimilates successfully into the view. It is recognisable, and different to its context, but the materials, tones and the amount of the tallest proposed buildings visible above the existing suburban roofline is limited and does not create an awkward or harmful composition. As such I consider the effect at completion and maturity to be **moderate and neutral**.

Group 2 – Users of the Millennium Green Open Space

6.3.3. This receptor group relates to viewpoint 1 within the Millennium Green area, and it should be noted that it is the worst-case position for views representing this receptor (with many other views being oblique to the change or within woodland). I consider the appeal scheme to overall have a **substantial and beneficial effect**. The Appeal scheme creates a number of positive visual changes – a positive edge to Woodcote Green Road and increased street trees and vegetation, and the visibility of higher buildings beyond this positive frontage is limited to the degree that it does not detract from the very beneficial change to the existing appeal site buildings and street edge, which currently had a negative visual contribution.

Group 3 – Users of Chalk Lane / Woodcote Green Road / Woodcote Road within the Chalk Lane Conservation Area

6.3.4. I consider this visual receptor to receive a **moderate and neutral** effect. The proposed change will be visible above the semi-detached dwellings along Woodcote Green Road, but to a limited degree. Its appearance and set back is a positive aspects of the view, and in combination with the amount of building visible above the existing buildings being restricted to a noticeable degree I consider this effect to be neutral.

Group 4 – Users of St Joseph’s Catholic Church

6.3.5. Due to the distance and that the proposed change is a small part of the view and set behind existing hospital buildings, I consider the appeal scheme to give rise to a **slight and neutral** visual effect at completion and maturity

Group 5 – Users of Dorking Road

6.3.6. Similarly, due to the intervening hospital buildings, the visual effect on this receptor at completion and maturity will be **slight and neutral**.

6.4. Policy Analysis

6.4.1. I consider below how my findings relating to townscape and visual effects relate to the policies identified at my Section 2.

National Policy

- 6.4.2. I find that Scheme B does seek to optimise the use of what is an incongruous and unsightly part of the Epsom Hospital site. It promotes a positive architectural approach, shaping interesting internal spaces whilst responding positively to its site edges in a way that is sympathetic to local character.
- 6.4.3. It promotes a form of development that is clearly more significant in scale than its context, but this is the case with the existing Epsom Hospital and appeal site for many years. The positive architectural approach taken does result in neutral or beneficial townscape and visual effects and no adverse effects.
- 6.4.4. As a result I find it is aligned with both NPPF 122 and 127.

Local Policy - Epsom Core Strategy (2007)

- 6.4.5. Policy CS5 identifies that high quality and inclusive design will be required. I consider Scheme B to meet that test, it has a sensitive response to the site edges, and promotes a character and appearance of development that is sympathetic to its context. As such, it does create an attractive development, reinforces local distinctiveness and makes efficient use of land.

Local Policy - Epsom Development Management Policies Document (2015)

- 6.4.6. In respect of policy DM9, the Scheme B clearly takes the opportunity to enhance the low-quality townscape character of TCA 35E, resulting in a beneficial effect upon it. The scheme is compatible with local character largely through its material choice, and delivers further beneficial effects due to the quality of the architecture and how it provides a positive frontage to key edges and spaces, whilst disguising its mass to assimilate successfully into its context. The lack of adverse townscape and visual effects demonstrates its compliance.
- 6.4.7. In respect of policy DM10, the Scheme B does incorporate principles of good design – it appropriately addresses key frontages, promotes a positive landscape treatment and uses an appropriate form of materials to reflect its context. I therefore consider the appeal scheme to meet this test.
- 6.4.8. In respect of policy DM11, the appeal scheme does make efficient use of land, and a 40 dwellings per hectare restriction placed upon it is wholly inappropriate due to the size and scale of the buildings on site – complying with this density ceiling would clearly in this case not lead to making efficient use of land and stop the scheme complying with that aspect of the Local Plan.
- 6.4.9. Finally, in respect of policy DM13, the appeal site is a townscape anomaly beyond the Epsom town centre, due to it containing substantial buildings in a suburban context, with the existing buildings by far exceed the 12 metre height restriction imposed by this policy. I do not consider this policy test to be appropriate to this site for this reason.

6.5. Conclusions

6.5.1. 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 that on balance highlight a positive townscape effect. This includes the changes to the Epsom Hospital site itself, but also TCA37, particularly the Millennium Green site where the very positive landscape frontage to Woodcote Green Road and the lower level buildings set back from (but positively addressing) the space enhances both the view and the townscape qualities of this area. Table 8 summarises these conclusions below.

6.5.2. 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 effect, relating to the visual experience from the Millennium Green open space within TCA 37 (see Table 9 over the page).

6.5.3. 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.

6.5.4. 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 this 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 B – 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 B – 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

7. WOODCOTE GREEN ROAD FRONTAGE

7.1. Introduction

- 7.1.1. The reasons for refusal of both Appeals A and B reference the lack of landscape opportunity on the Woodcote Green Road frontage in the second reason for refusal. This was bound together to the first reason for refusal in the Case Management Conference, however for completeness I specifically address it here.
- 7.1.2. It should be noted that Appeal A (following the Wheatcroft Amendments) proposes the same building set back and landscape solution to Woodcote Green Road as Appeal B and therefore my analysis below applies equally to both schemes.

7.2. Planning Committee Report (Appeal B dated 22 April 2021)

- 7.2.1. The Planning Committee Report to Appeal B considers the Woodcote Green frontage at its 17.26-17.27, stating (my emphasis in bold):

17.26 Officers recognise that in its current form, the Site does not offer a functional space. The scheme put forward seeks a considered landscaping scheme, integrating the proposed buildings into character areas and to provide linkages to Woodcote Millennium Green. With a LEMP in place, the landscape value of the Site would be maintained in the long- term.

*17.27 Whilst the proposal would result in some tree loss, the scheme would seek a greater number of new trees, which would be managed appropriately through a LEMP. **The proposed landscaping entwines the proposed buildings, character areas and the Woodcote Millennium Green, creating a sense of place.** In conjunction with the public benefits of this proposal, including a contribution for the ongoing maintenance of the Woodcote Millennium Green, the proposal is considered acceptable, complying with policy DM5.*

7.3. Analysis

- 7.3.1. It's difficult to disagree with the Committee report. At present, the Woodcote Green Road frontage is a poor-quality landscape frontage that has a negative contribution to townscape character (see Photos 1 and 2 over the page).
- 7.3.2. By contrast, both appeal schemes create a landscape corridor of between 5 and 10 metres width between the proposed buildings and the back of the footpath kerb that provides a wide additional corridor within which a double row of trees with paving and benches are proposed.
- 7.3.3. This proposal is illustrated at Extract 1 (Appeal B CGI 4) and Extract 2 (an extract from the landscape masterplan for Appeal B). These extracts are shown on the following pages.

Photo 1 – View North Eastwards Along Woodcote Green Road



Photo 2 – View South Westwards Along Woodcote Green Road



Extract 1 – CGI of Woodcote Green Road (see CGI View 4 for Appeal B)



Extract 2 – Extract from Landscape Masterplan (from drawing 656_P_00_100 - Appeal B)



7.4. Conclusion

- 7.4.1. 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.
- 7.4.2. My conclusion is that this claim of harm or case of an opportunity not being taken is entirely incorrect and inaccurate.

8. CONCLUSIONS

8.1. Planning Policy and Guidance

- 8.1.1. 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.

8.2. Description of Site and Appeal Scheme(s)

- 8.2.1. 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.
- 8.2.2. 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.
- 8.2.3. The Scheme Also abuts a number of 2 storey residential properties on Woodcote Green Road, Digdens Rise and Hylands Road.
- 8.2.4. 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.
- 8.2.5. 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.
- 8.2.6. 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.
- 8.2.7. 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

8.3. Townscape and Visual Baseline

8.3.1. 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.

8.3.2. 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	

8.3.3. 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

8.3.4. 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.

8.4. Appeal A - Townscape and Visual Effects

8.4.1. 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

8.4.2. 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

8.4.3. 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.

8.5. Appeal B - Townscape and Visual Effects

8.5.1. 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.

8.5.2. 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).

8.5.3. 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.

8.5.4. 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

8.6. Woodcote Green Road Frontage

8.6.1. 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.

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

8.7. Overall Conclusion

8.7.1. 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.

8.7.2. 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.

8.7.3. 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.

8.7.4. 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.

8.7.5. 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.

8.7.6. 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.

8.7.7. 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.

Appendix A
Glossary

Glossary of Terms

“Appeal A”	appeal against Decision A submitted to PINS on 29 March 2021 with reference APP/P3610/W/21/3272074
“Appeal B”	appeal against Decision B submitted to PINS on 4 June 2021 with reference APP/P3610/W/21/3276483
“Appeals” or “this Appeal”	the conjoined Appeal A and Appeal B
“Appeal Site”	Epsom General Hospital, Dorking Road, Epsom, Surrey, KT18 7EG
“Appellant”	Senior Living Urban (Epsom) Limited
“Council” or “LPA”	Epsom and Ewell Borough Council
“County Council”	Surrey County Council
“CQC”	Care Quality Commission
“Decision A”	Refusal notice dated 23 November 2020 issued by the Council in relation to Planning Application A
“Decision B”	Refusal notice dated 6 May 2021 issued by the Council in relation to Planning Application B
“Guild Living”	Developer and operator of urban later living schemes on behalf of L&G
“IV”	Inspired Villages
“L&G”	Legal and General
“LGC”	Legal and General Capital
“LGLL”	Legal and General Later Living Limited
“NPPF”	National Planning Policy Framework
“PPG”	Planning Practice Guidance
“Planning Application A”	Planning application reference 19/01722/FUL for Scheme A
“Planning Application B”	Planning application reference 21/00252/FUL for Scheme B
“Scheme A” (referred to in earlier documentation as the “Original Scheme”)	Demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people arranged in two buildings, comprising 302 to 308 care residences, 8 to 12 care apartments and 26 to 30 care suites providing transitional care, together with ancillary communal and support services Use Class C2, 24 key worker units Use Class C3, childrens nursery Use Class D1 as well as associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space as amended by the Wheatcroft Amendments
“Scheme B”	Demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people arranged in two buildings, comprising 267 care residences, 10 care apartments and 28 care suites providing transitional care, together with ancillary communal and support services Use Class C2, 24 key worker units Use Class C3, childrens nursery Use Class E, as well as associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space
“Wheatcroft Amendments”	The changes to Scheme A accepted by the Inspector on 16 June 2021 under the “Wheatcroft” principle

Appendix B

TVIA Methodology

Townscape and Visual Impact Appraisal Methodology

1. This Appendix provides a synopsis of the methodology used in appraising the townscape and visual aspects of the proposed scheme which is in accordance with the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (LI and IEMA 2013), referred to hereafter as GLVIA3.
2. This Townscape and Visual Impact Appraisal is not a full impact assessment as formally required as part of an Environmental Impact Assessment (EIA), it is a less formal appraisal. Paragraph 3.2 of GLVIA3 states:

“As a standalone ‘appraisal’ the process is informal and there is more flexibility, but the essence of the approach — specifying the nature of the proposed change or development; describing the existing landscape and the views and visual amenity in the area that may be affected; predicting the effects, although not their likely significance; and considering how those effects might be mitigated — still applies.”
3. Our methodology reflects the approach advocated within GLVIA3, we apply the same methodology for formal impact assessments and informal appraisals. However, due to the less formal requirements, we provide a written summary of the likely sensitivity and magnitude with a conclusion relating to the overall importance of the effect¹.

General Approach

4. A rigid or overly formulaic approach to appraising effects, on both landscape resource and visual amenity, is avoided². This type of approach is often criticised due to its inflexibility, tendency to not respond to site specific conditions and misuse – something that GLVIA3 has focused on.
5. Matrices and tables are not used to determine judgements in respect of sensitivity or magnitude of effect, they are provided to assist in the analysis and communication of these matters. The emphasis of the appraisal, therefore, relies on explanation of the logic behind judgements of sensitivity and magnitude of effect, with matrices provided to summarise and support the various appraisal considerations³.
6. To assist with clarity of appraisal, the terms negligible, low, medium and high are used for susceptibility, value, sensitivity and magnitude of effect. The term ‘negligible’ is added to the assessment of magnitude of effect where the proposed change is entirely or barely perceptible. Nature of effect is judged to be beneficial, neutral or adverse.
7. Townscape susceptibility is particular to the type of change proposed, rather than inherent⁴.

¹ As per Landscape Institute GLVIA3 Statement of Clarification 1/13 (item 4) and GLVIA3 Statement of Clarification 1/14 (item 2) <https://www.landscapeinstitute.org/technical/glvia3-panel/glvia3-clarifications/>

² In accordance with GLVIA3 para 3.18

³ In accordance with GLVIA3 para 3.36

⁴ In accordance with GLVIA3 para 5.40

8. The appraisal includes reference to both 'impact' and 'effect'. 'Impact' is used in reference to the action being taken (such as vegetation loss), whereas the 'effect' is defined as the change (beneficial or negative) that results from that action, or from the whole development⁵.
9. The appraisal relies on professional judgement. To ensure a consistent and transparent approach, all judgements made are discussed and debated with at least one other assessor prior to completion.

Townscape and Visual Baseline

10. The baseline exercise initially considers the sensitivity of the townscape and in doing so identifies an appropriate study area within which the change is likely to be perceived, either directly or in sequence. Sensitivity is interpreted as a combination of the townscape's susceptibility and value. Susceptibility translates as a townscape's relative ability to accommodate change of a particular type without undue consequences to its baseline and an assessment involves an appreciation of the quality and cohesion of the existing townscape, the location of the proposed change in relation to key townscape features and the prevalence of the type of land use being proposed.
11. Assessing how a townscape is valued is informed by the presence of its recognition through national or local planning designations or reference in local guidance, characterisation studies or evidence base documents. The criteria for judging the susceptibility and value of the townscape is set out at Matrix 1, below.
12. The townscape and visual baseline appraisal is informed by existing characterisation studies available. The key characteristics identified by these studies are identified, validated by fieldwork, analysed as to where they can be located within the site and its context, and appraised as to how influential these features are.
13. The visual amenity baseline firstly identifies the likely visibility of the proposed change. This uses a variety of techniques, as deemed most appropriate to each specific site and context, including Zone of Theoretical Visibility Modelling and Mapping, Augmented Reality visibility tests and on-site field work and Visual Envelope mapping.
14. This exercise then considers the susceptibility of the viewer considering the type of receptor and activity, along with their expectation of a view, and its importance. Visual value is separately assessed by considering its likely popularity, volume of use and status (i.e. if it has been protected or recognised in any planning based documents). The criteria for judging the susceptibility and value of the visual amenity is set out at Matrix 2, below.
15. This process leads to the identification of representative viewpoints which reflect the typical experience of people living in and moving through the area where the change is likely to be perceived (and beyond this where appropriate).

⁵ In accordance with GLVIA3 para 1.16

Appraising Townscape and Visual Effects

16. The appraisal of effects on the townscape resource considers a range of factors including the size and scale of the change proposed considering the extent of townscape elements to be lost, the degree to which important perceptual aspects of the townscape are altered and whether the key townscape characteristics that are critical to its character are removed. The geographic extent of the change is assessed, as is the duration and reversibility of the change. The criteria for judging the magnitude of the landscape effect is set out at Matrix 3, below.
17. The appraisal of effects on visual amenity considers a number of factors including the scale of change visible, how much this change contrasts or integrates with the existing view, the angle of the view to the receptor, the distance of the view, and the extent of which the change occupies the view. The criteria for judging the magnitude of the visual effect is set out at Matrix 3, below.
18. The nature of the townscape and visual effects is also assessed by answering the questions as set out at 5.37 and 6.29 of GLVIA3. This includes assessing the degree to which the proposal fits with existing character, the contribution to the townscape the development may make in its own right (even if it does contrast with local character) and whether the proposed change would affect the quality of the visual experience, given the nature of the existing views. The nature of change is identified as being adverse, beneficial or neutral (see Matrix 4).
19. Conclusions relating to the sensitivity of the townscape resource / visual amenity are combined with the conclusions of the magnitude of effect to identify the importance of the predicted effect (see Matrix 5). For non-EIA development this does not assess the overall significance of effects arising (instead identifying the 'importance' of the effect⁶). Matrix 5 intentionally uses a non-rigid matrix to inform and support the assessor's judgement of what should be considered important.

⁶ In accordance with the Landscape Institute's GLVIA3 Statement of Clarification 1/14 28-01-14, non EIA development only assesses 'importance' not 'significance'

Matrix 1 - Townscape Sensitivity

	Susceptibility	Value
High	The townscape is typically of a high quality and cohesiveness. The proposed change would be prominent in the appreciation of this townscape. The type of change being proposed is not typical of the townscape.	The townscape includes listed buildings, conservation areas or is of a recognised high value in planning policy, guidance, characterisation studies or evidence base documents.
Medium	The townscape is typically of a medium quality and cohesiveness. The proposed change would be noticeable but not prominent in the appreciation of this townscape. The type of change being proposed is recognisable in the townscape.	The townscape includes buildings and townscapes that are recognised as having local value through planning policy, guidance, characterisation studies or evidence base documents.
Low	The townscape is typically of a low quality and cohesiveness. The proposed change would not be noticeable in the context of this townscape. The type of change being proposed is common in the townscape.	The townscape includes few buildings of merit, and has no recognised value in planning policy, guidance, characterisation studies or evidence base documents.

Matrix 2 - Visual Sensitivity

	Susceptibility	Value
High	<p>The viewer's activity and expectation of a view is highly susceptible to change.</p> <p>This would typically include people engaged in outdoor recreation (using public rights of way for example), private residents or communities who have a high expectation of a view or visitors to heritage assets or similar attractions.</p>	<p>Consideration of the formal status of the view, reference to the view in published literature and visitor information leads to the conclusion that the view has high value.</p> <p>Such views are likely to be specifically identified in planning documentation or local guides/plans.</p>
Medium	<p>The viewer's activity and expectation of a view is of medium susceptibility to change.</p> <p>This would typically be travellers on road, rail or other transport routes, unless passing through an area of particular scenic interest.</p>	<p>Consideration of the formal status of the view, reference to the view in published literature and visitor information leads to the conclusion that the view has medium value.</p> <p>Such views might be located within a designated area identified in planning documentation or local guides/plans or be subject to policies that indicate their value.</p>
Low	<p>The viewer's activity and expectation of a view is of low susceptibility to change.</p> <p>This would typically include people engaged in outdoor sport that does not involve appreciation of the view, or people at work.</p>	<p>Consideration of the formal status of the view, reference to the view in published literature and visitor information leads to the conclusion that the view has some value but it is categorised as being low.</p> <p>Such views are very unlikely to be identified in planning documentation or local guides/plans.</p>

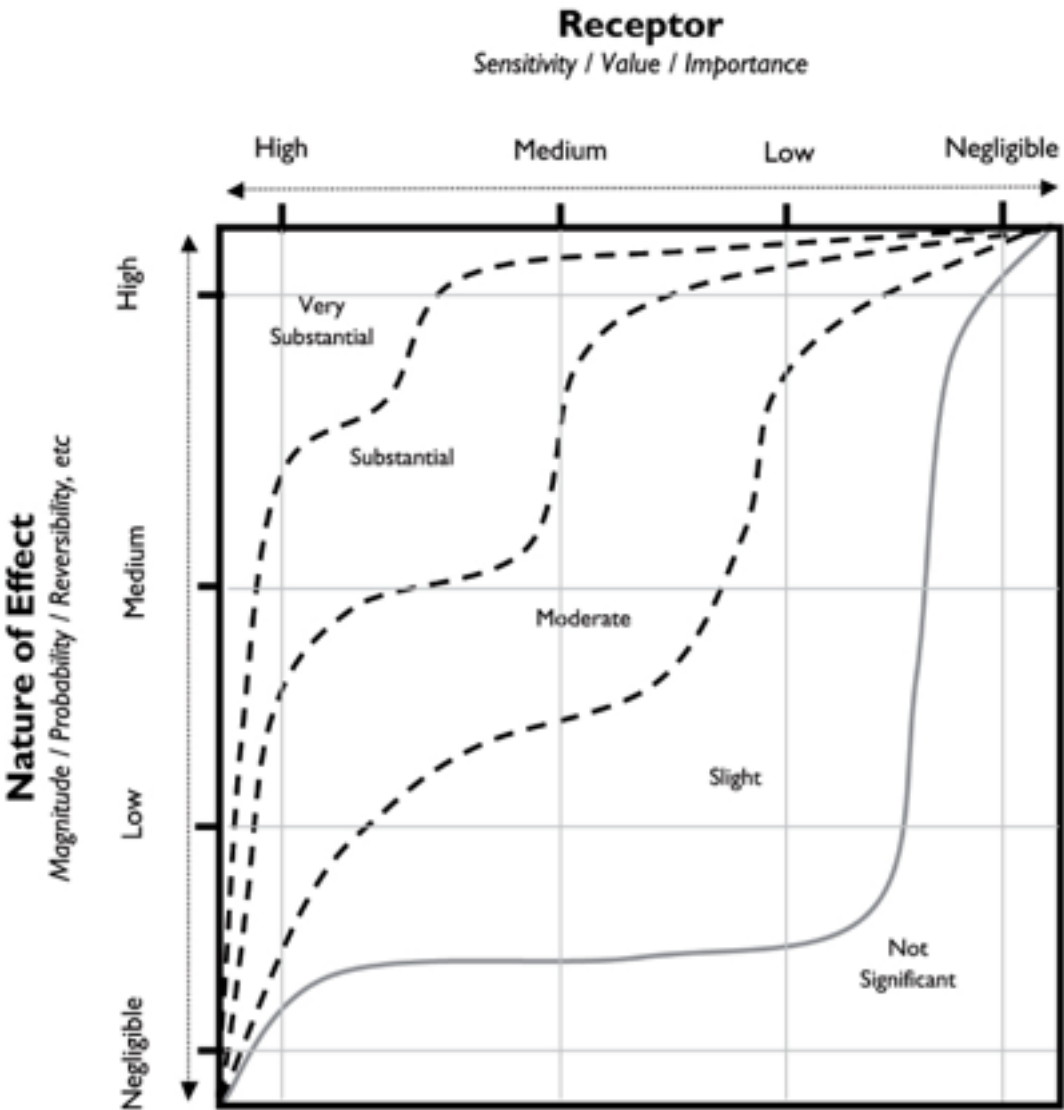
Matrix 3 – Magnitude

	Visual	Townscape
High	The proposed change to the view provides a significantly different built form, with high contrast to the existing view, the loss of key visual features and the type of view typically being a full view in nature.	The proposed change creates a significant loss of existing townscape that contributed positively to the character of the area, or alters it to the extent that the perception of the local townscape has fundamentally changed. This effect typically (but not always) is felt over a wide geographic area.
Medium	The proposed change to the view provides a recognisably different built form, with some contrast to the existing view, the loss of some (not key) visual features and the type of view typically not being a full view in nature.	The proposed change creates a recognisable loss of existing townscape that contributed positively to the character of the area, or alters it to the extent that the perception of the local townscape has notably changed. This effect typically (but not always) is felt over a local geographic area.
Low	The proposed change to the view provides a subtly different built form, with little contrast to the existing view, the loss of minor visual features and the type of view typically being a glimpse or partial view in nature.	The proposed change creates a minor loss of existing townscape or alters it to the extent that the perception of the local townscape has slightly changed. This effect typically (but not always) is felt within the site and its immediate setting.
Negligible	The proposed change to the view is either entirely or almost imperceptible.	The proposed change to the townscape is either entirely or almost imperceptible.

Matrix 4 – Significance

	Visual	Townscape
Very Substantial	A combination of the sensitivity to change and magnitude of effect results in a development that has a very substantial effect on visual amenity.	A combination of the sensitivity to change and magnitude of effect results in a development that has a very substantial effect on landscape character and resource.
Substantial	A combination of the sensitivity to change and magnitude of effect results in a development that has a substantial effect on visual amenity.	A combination of the sensitivity to change and magnitude of effect results in a development that has a substantial effect on landscape character.
Moderate	A combination of the sensitivity to change and magnitude of effect results in a development that has a moderate effect on visual amenity.	A combination of the sensitivity to change and magnitude of effect results in a development that has a moderate effect on landscape character and resource.
Slight	A combination of the sensitivity to change and magnitude of effect results in a development that has a slight effect on visual amenity.	A combination of the sensitivity to change and magnitude of effect results in a development that has a slight effect on landscape character and resource.
Not Important	A combination of the sensitivity to change and magnitude of effect results in a development that has a non-important effect on visual amenity.	A combination of the sensitivity to change and magnitude of effect results in a development that has a non-important effect on landscape character and resource.

Matrix 5 – Combining Judgements



NB. In accordance with the Landscape Institute's GLVIA3 Statement of Clarification 1/14 28-01-14, non EIA development only assesses 'importance' not 'significance' and therefore for this type of development 'not significant' becomes 'not important'.

Matrix 6 – Nature of Effect

	Visual	Townscape
Adverse	When comparing the existing and proposed visual experience, the proposed changes reduce its quality. This is usually achieved by adding discordant or incongruous visual elements to the composition of the view.	The proposed change introduces elements that are discordant or incongruous with the existing townscape. The proposed change makes a negative contribution to the townscape in its own right, even if contrasting with the prevailing character.
Beneficial	When comparing the existing and proposed visual experience, the proposed changes increase its quality. This is usually achieved by adding positive visual elements to the composition of the view.	The proposed change introduces elements that enhance the existing townscape. The proposed change makes a positive contribution to the townscape in its own right, even if contrasting with the prevailing character.
Neutral	When comparing the existing and proposed visual experience, the proposed changes have no notable impact on its quality. This is usually achieved by there being no notable change in the composition of the view, or by the change in the view being consistent with the existing visual experience and not being sufficiently different to arrive at an adverse or beneficial conclusion.	The proposed change fits into the existing character without introducing either positive or negative elements, or that these balance to create a neutral effect.