

## Inquiry Statement

1. I am Penny Lea, my parents are Marion and Lawrence Lea, who own and live at 40 Woodcote Green Road. I am making this statement on their behalf, and I share their views. I lived at number 40 throughout practically the whole of my childhood so I am extremely well acquainted with the property, its setting and the surrounding neighbourhood.
2. I have some general points I have not yet raised in my representations. Before that I want to zoom right in to Number 40, and consider the impact of the development from its perspective.
3. It is weird for my parents, and me, to hear the adverse impacts on their property being regarded as low, or being ignored, when it certainly does not feel that way to them. We imagine that no-one, naturally, will have assessed the impact on the amenity of Number 40 in as much detail as we have, given their unique perspective. So I would invite you to zoom in on Number 40 and imagine how you would experience the effect of the development if you were living there - or at Number 46.
4. **Loss of privacy** is a major issue. It is utterly peculiar to hear the Appellant's case that there will not be any loss of privacy to Numbers 40 and 46; to me this shows that they cannot have an appreciation of the properties' perspectives. It is true that the Appellant's design change to the west façade of the West Building (introduction of sawtooth façade, with windows facing north/south only, save for some clerestory windows) removes the window-to-window intrusion of privacy into the east flank of Number 40's house directly facing the site. (Please note by way of comparison that the current Woodcote Lodge has no windows in the side facing Number 40.)
5. However, the stretch of sawtooth façade does not prevent the overlooking into the rear garden and rear habitable rooms which will occur from the huge number of windows beyond the sawtooth section. Neither does the cranking away of the building at an angle from the boundary prevent overlooking. And overlooking from the sensory roof terrace garden remains. If you look at CGI Image 03 (CD2.1.57) this shows that even from a distance back from the 1.5m balustrade, which is itself set back 1.5 metres from the edge of the terrace, one can see Numbers 40 and 46, and that is with the trees in full leaf.
6. Furthermore, as Mike Kiely referred to, the revised design for Appeal B introduces new overlooking into both the rear garden and rear habitable rooms of Number 40, through the introduction of balconies into the south-facing end of the West Building.
7. With regard to the landscaping issues in the second reason for refusal, I wish to make a point regarding the planting which exists within my parents' garden along their border with the site. In his opening statement on behalf of the Appellant Mr Warren said that *"From 40 and 46 Woodcote Green Road, the schemes would build in additional landscaping to add to the considerable mature tree planting that those houses already have in their gardens"*. My parents have in their border along the site boundary several small trees, and shrubs, including a short stretch of hedge which is currently fairly tall.
8. I wish to highlight that this hedge is not a permanent feature. My parents have it reduced in height from time to time because when it gets as tall as it is at the moment, it becomes in

itself overbearing. Furthermore, this hedge is coming to the end of its life. They are leaving it as it is at the moment because it might help as a screen during any demolition or construction phase; but it is not something they otherwise desire to keep so tall. So, it cannot be relied upon as part of any permanent solution by the Appellants.

9. Mr Warren also said that this considerable mature tree planting in their gardens is “*a function, no doubt of the juxtaposition that has always existed between uses and scales along that boundary*”. My parents disagree with this: currently they only want their planting to screen out the hospital surface parking, and it has nothing to do with current hospital buildings. Otherwise the planting they have is just what they like to have in their garden, and could easily be an appropriate border to have with another residential property.
10. If the proposed way of attempting to screen the development is a dense boundary of significant vegetation, then if it is going to be anything like of a sufficient size to block out the huge mass of building and overlooking windows, then this in itself would create an overbearing effect, which is completely undesirable.
11. With regard to the issue of **Overbearing**, the Appellant argues that the mass of the building is broken up by the variety of heights, setbacks and elevation planes, and that this “*mitigates overbearing impacts arising from the scheme.*” But the West Building (and the East one too) is such an enormous building to start with that, that these techniques for breaking up a mass do not do enough to break down the overbearing impact on residential neighbours. My parents’ property will be completely dominated and dwarfed by the West building, and they will end up with a very oppressive living environment both in its rear garden and in its rear facing habitable rooms, and also in the dine-in kitchen whose side window and glazed door face the site. The light coming into the lovely large landing window will be diminished.
12. With regard to **loss of outlook**, the hospital site existed before my parents moved into Number 40, over 50 years ago. Various buildings have in that time been demolished, built, replaced, the most recent one close to them being Woodcote Lodge. Clearly my parents do not have a problem with development on the site as they have lived there through many changes. However, they never contemplated buildings of such a size, and so radically different from anything that has been there previously. A significant expanse of sky visible from inside the rear of the house and the rear garden will have disappeared, replaced with a rock face of brick, metal and glass.
13. All the CGI impressions depict the buildings against a backdrop of blue skies, with greenery trailing from balconies or balustrades. I wonder whether there will be an obligation on residents to maintain the window boxes as without it the facades will present an even harsher appearance.
14. The proposed buildings look to me more office-like than residential accommodation. A new style of building can be a shock to a neighbourhood; I imagine that sometimes this is softened where the building is in fact a trailblazer of a sort – the first of a new style to spread through an area. However, I cannot imagine that the Woodcote Estate and neighbouring conservation areas will be redeveloped within any foreseeable future; in fact, surely with the march of time it is not impossible that the 1930s houses surrounding the hospital site might

themselves one day become designated as a conservation area. The proposed buildings are going to stand out like a sore thumb for many, many years to come.

15. Although the third reason for refusal does not refer to it, **noise and disturbance** is another type of impact on neighbouring properties' amenities of significance to Number 40.
16. Although the West Building will be situated slightly further away from Number 40's property than is the current Woodcote Lodge, this permits the Appeal scheme designs to position the site access road between the West Building and Number 40, which will run along the full length of the shared boundary. As a result noise and disturbance along with pollution will be introduced right next to Number 40.
17. Tim Spencer in his Proof of Evidence rightly says (para 4.48) that "*The existing site is largely utilised as a car parking area associated with the Epsom General Hospital.*" However, we do not agree with the next statement, where he says that "*The Transport Assessment, confirms that the current use of the site attracts more vehicular movements than the Appeal Schemes. The open nature of the existing surface level parking area is furthermore considered to result in increased noise and disturbance, whereas the Appeal Schemes provides the bulk of the car parking within the building, which will provide a high level of screening to adjacent residents.*"
18. In our opinion the opposite is true; that is, that the Appeal Schemes will result in more noise and disturbance than is currently the case.
19. The current hospital parking area is not approached along the residential boundary but elsewhere. My parents do not notice much traffic movement in and associated noise from the parking area. They believe that this parking is for the use of hospital staff, which means that generally a vehicle will stay put for the duration of the driver's working day. Meyer Brown's Transport Assessment (January 2021) seems to confirm this: it refers to existing hospital trips as being "*mostly staff trips at the beginning and end of the working day*" whereas "*the trips associated with the proposed care residences will be more evenly distributed during the day*" – ie the Appeal Schemes will result in continuous noise and disturbance.
20. In addition, although the bulk of the parking to be provided under the Appeal Schemes will indeed be within the building, the few surface level parking spaces are abutted up against the full length of Number 40's boundary (unlike the present situation where it is not for the full length); further, these spaces are likely to result in a higher turnover: I imagine that short-term visitors will prefer to use them if available rather than the stacker parking system. This will result in more noise and disturbance for the neighbouring properties than the current parking arrangements.
21. Most significant however is the noise and disturbance generated by the site access road: all vehicles (bar some rare exceptions) entering the site will need to do so via the entrance roadway running along the length of Number 40's boundary, whether they go on to park or carry out a quick delivery. This intense concentration of all site traffic along this boundary within metres of my parents' property, and moreover throughout the day, will create an enormous adverse effect in terms of noise and disturbance, including pollution. This aspect

is not covered in the *Environmental Noise Survey and Plant Noise Assessment Report* by Hann Tucker Associates (dated 20 January 2021).

21. In contrast, currently there is no roadway running between Number 40's boundary and the current site building, ie Woodcote Lodge. This has been the case for decades. By the way, although there is a dropped kerb close to my parents' dropped kerb, this related to a driveway for House which preceded the present Woodcote Lodge.
22. Regarding the issue of the **proximity of the site entrance to Number 40's driveway**, we consider that the close proximity combined with the volume of traffic which will be using the site entrance road will make it more difficult for residents to reverse out of its driveway. One could argue that traffic entering the site will slow the traffic flow in the road, thereby in fact making it easier to reverse out. However, I believe it is possible that confusion for road users may result.
23. I asked Surrey Highways whether, when considering an application for a residential vehicle crossover licence, they have a minimum distance which it requires between a vehicle crossover and a nearby junction. They replied that the minimum distance is 10 metres although this is discretionary depending on various factors. Obviously here the residential driveway predates the existence of a junction, but this seems like relevant information.
24. I do not know whether the relationship and dynamic between the site access road entrance including its bellmouth and the position of number 40's driveway has been considered, but the fact remains that traffic movement in this location will be increased from currently zero to whatever it will be, and is likely to be significant due to the concentration of all arriving traffic using this one entrance.
25. The Transport Assessment includes a paragraph headed "*Proposed Site Access on Woodcote Green Road*". It states (para 6.8) that "*The proposed access junction is at a different location to the existing arrangements and therefore only the 2026 forecast scenario has been tested. For purposes of analysis, all traffic has been assumed to be travelling in and out of one junction (rather than separate entry and exit locations as proposed).*" It concludes that "*that the access junction will work well within capacity following redevelopment of the site.*" It seems as if a lot of assumptions are used and so I query the resulting conclusion.
26. Furthermore, I do query how this issue can have been considered accurately given that all plans I have seen do not draw Number 40's property to scale and exaggerate the distance between Number 40's driveway and the boundary fence: it is approximately 4.8 metres. (The distance between the actual house and the boundary fence is also exaggerated: it is 1 metre at the narrowest point.) These exaggerations can be seen clearly on the document entitled Drawing with Separation Distances APP\_R02 (10 documents below CD8.4).
27. Also, a Planning Officer's Update Report relating to the second application (CD3.6) gave an exaggerated measurement when responding on this point, stating that "*There is circa. 15 metres between the proposed site access and the driveway of 40 Woodcote Green Road*".
28. I also have some other points I wish to make, unrelated to the perspective of Number 40.
29. The first regards the **nursery**. In the revised design, the nursery has been relocated from the West Building to the East and according to Guild Living's document "*Design Changes from*

*Refused App. 19/01722/FUL* (April 2021) the play area will be “*relocated and incorporated into the landscape design of the central plaza.*” Unlike in the original design, I cannot see in the revised plans a dedicated play area for the nursery. Surely a nursery has to have an outdoor space, and one with no public access for obvious safeguarding reasons. If there is not room for such an area, surely this is an indication that the site is overdeveloped.

30. My second point regards the Appellant’s view as expressed in their opening statement that, “*as in the past, the hospital site is not the same as the residential hinterland and successful schemes on it are likely to have some contrasts of scale and height with those houses. Not to have such a juxtaposition would fail to reflect the history of the site*”; and their view that it is reasonable to take cues for the proposed development from the hospital-style of buildings as these have been existence for a while.
31. It is a true that there are some larger buildings on the hospital site, which are less than aesthetically pleasing, and that these are a feature of the local area; but they are not features in a positive sense, and I find it bizarre to use their existence as one way of justifying the proposed building designs.
32. Equally I would like to point out that not all hospital buildings are, or were, large and unattractive; and surely those others can equally be candidates to inform the style of later buildings. A case in point is not only Woodcote Lodge, but its predecessor, which I think was built in the 1800s. I am referring to that building as York House, although I understand that there was some debate over its actual name or whether this was the name of another building. York House was demolished around 1997 to make way for Woodcote Lodge, and we don’t remember there being much of any time gap if any between the two. Below is a link to a local history page which includes 2 photos of York House: of the back and of the front of. These photos show a building of a completely different scale to others, and one which, I contend, works much better in this part of the site (as does Woodcote Lodge). I remember it had a lovely glasshouse on one end which I could see from our landing window.  
<https://eehe.org.uk/?p=29874>
33. Those photos also include a photo of Woodcote Lodge back in 2012 and looking very presentable. I agree with Mike Kiely’s point that the development site has only started to look a little dilapidated in recent times. In relation to yesterday’s discussion as to whether the replacement key worker units will be an improvement due to the alleged substandard of those previously contained within Woodcote Lodge, I wish to point out that Woodcote Lodge was built not quite 25 years ago. If it is substandard, that is quite surprising given how recently it was built.
34. My third point regards **density**, In our view, to fit in the number of units which the Appellants consider necessary to make this a commercially viable development for them, along with the communal facilities which form part of the whole concept, it is simply the case that the site is not big enough to accommodate this comfortably, and that the Appeal schemes amount to overdevelopment.
35. A Greater London Authority document “Housing in London 2020 - The evidence base for the London Housing Strategy” dated October 2020 provides average densities of dwellings per hectare of residential land by local authority. It states (page 31) that “*Apart from the City of*

*London at 345dph, the local area with the highest density in the country is Tower Hamlets at 241dph. 18 of the top 20 are in London, with Portsmouth the highest density non-London area at 76dph.”* ([https://www.london.gov.uk/sites/default/files/housing\\_in\\_london\\_2020.pdf](https://www.london.gov.uk/sites/default/files/housing_in_london_2020.pdf))

36. I believe I saw a reference somewhere to the density of the proposed development being 237 dph. If my recollection is wrong, then very crudely it amounts to around 200 dph (given a site of 1.5 hectares, with 300 plus dwellings). This is not that far off Tower Hamlets. I know that taking a reading for a lone set of apartments will give a higher density than looking at a whole local authority; but surely this gives an indication of how incredibly out of kilter the density of this proposed development is for this location.
37. Tim Spencer Proof of Evidence, *“4.33 A significant uplift in the overall quantum and scale of development across the site compared to the existing Site condition is necessary in order to deliver homes needed in the Borough and to meet the need for housing with care.”* Surely an acceptable significant uplift needs to optimise the site, not maximise it, as in max it out.
38. My final point regards the Appellant’s position regarding the provision to the public of the restaurant, café and certain other facilities confusing. The Appellant presents this as a benefit. However, the Transport Assessment (para 5.21) says that: *“Although [retail, a restaurant and a café] will be open to the public, they are not expected to be direct vehicular trip attractors, not least as they will not be visible from Woodcote Green Road and therefore will not attract any pass-by trips”*. Is this apparent contradiction resolved by concluding that the public can come, but not by car?
39. The Transport Assessment then says that *“It was agreed with SCC that the likely impact of these uses, and the likelihood of them being visited by the general public with no other reason to be visiting the site, would be assessed through undertaking surveys at the existing Costa Coffee, M&S Food and WHSmith units within Epsom General Hospital”* (para 5.22).
40. The Transport Assessment reports the results (para 5.24) as demonstrating that *“a minimal number of visitors to the retail units at the hospital over the two days made a dedicated trip to do so (i.e. they had no other reason for being at the hospital). Therefore, it is not considered to be necessary to undertake any further assessment of the potential for dedicated vehicle trips to the retail, restaurant and café elements of the proposed development.”*
41. Important conclusions on the potential generation of traffic to the site were drawn from this information, but it was flawed: firstly, because the surveys were carried out between the hours of 11am and 3pm only, and on only 2 days; secondly, because these results are based on the assumption that outlets situated within a hospital are comparable to a Guild Living café, restaurant or retail unit, situated in a residential development. Of course the survey was going to find that most of the users of those hospital outlets were people who worked at the hospital (57.8%) followed by people visiting a hospital patient (15.5%), the smallest group being those who specifically came to the hospital to use those outlets (1.1%).
42. I am concerned that the conclusions drawn from this flawed survey feed into the Transport Assessment’s predictions of car movements and also parking needs for the development.

That concludes my statement. Thank you for listening.