

## **Representation to Planning Appeal APP/P3610/W/21/3272074**

**August 2021**

Thank you, sir, for giving me the opportunity to speak at this appeal against Epsom & Ewell Borough Council's refusal of the two planning applications for this re-development of land formally part of the Epsom Hospital site.

I am Liz Frost, one of the Woodcote Ward Borough Councillors, and this site falls within my Ward.

I addressed the Planning Committee, opposing the applications, at both the November 2020 and the April 2021 Committee meetings on behalf of my residents. However, because these representations were oral rather than written, the Council has not been able to convey them to you.

Before I start my statement, in the interests of transparency, I am one of the Trustees of the Woodcote Millennium Green Trust. Woodcote Millennium Green is the land in Woodcote Green Road opposite the Guild Living site. However this statement is purely representing Woodcote Ward residents.

I received a very large number of messages of concern about these proposals from residents, who were overwhelmingly opposed to them, mainly on the grounds of the height and mass of the buildings; harm to the character of the area; failure to contribute towards the borough's housing needs; and the other amenities proposed.

**Looking at the height and mass** of the buildings, the officer reports do not always give a true picture of the current situation. The tallest building on the hospital site, the Wells Building, is 6 storeys high. Although there is some roof plant, this is over a relatively small area. Both of the application proposals are for two blocks that would be far higher. Looking at the heights to the roof parapets, which is what people see and gives the overall impact, the proposed tallest parts of the buildings would be over 11 metres higher for the first application and over 6 for the second. As to Mr Warren's mention of the Council supporting developments in excess of 10 storeys high this was at variance with Council Policy, and the May 2018 Licensing & Planning Policy Committee recommending relaxing some height and density restrictions this was just for specific areas, eg town centres, stations and transport links, which this isn't.

For this development, the height of the Wells Building (further away from the residential housing) shouldn't be the height benchmark for the redevelopment of this site, which is surrounded by 2 storey suburban housing. These two proposed tall blocks would be over a very large area, making them appear massively out of scale with the surrounding buildings and the area generally, and extremely overbearing. They would dominate the area and the skyline from a wide area.

I appreciate that the design of the development 'steps down' towards the Woodcote Green Road frontage. However the buildings would still be too large, oppressive and present an enormous mass. There would be very significant impact on neighbours and their amenities, particularly those at 40 and 46 Woodcote Green Road, in Digidens Rise and in Woodcote Mews. Many hundreds of residents objected because they are concerned about the enormous scale of the development and the ramifications from this including overlooking, the perception of overlooking, loss of outlook and visual intrusion. The very modest amendments made in the second application do not come anywhere near to addressing these concerns.

### **Secondly the character of the area**

This is not a Town centre site, it is near the outer edge of the suburban area and close to conservation areas.

The housing density of these proposals would be over 200 dwellings per hectare. The National Design Code recommends 60-120 for urban neighbourhoods, and 30-50 for suburbs – which this is. The housing density in the surrounding area is mainly between 20 and 25 dwellings per hectare.

NPPF (122), DM10 and the National Design Guide emphasise that developments should be sympathetic to the local character. This very definitely isn't. The surrounding housing is mainly 2 storey detached or semi-detached properties. Woodcote Green Road has a semi-rural feel to it and this would be totally out of character.

The proposed soft landscaping is totally inadequate. The second application acknowledges this, but does not go far enough to address it from either an aesthetic or an environmental aspect.

Even with the small increases in the set back from the road, this development would still be out of character. The former hospital buildings were further

from the road, and of much less mass and height. Looking at the street scene (until the premature demolition work started), it has an overall pleasant green, edge of suburbia feel to it. The proposed development would destroy that, drawing the eye to the large mass of buildings and I believe that this would also harm the views, including from the nearby Conservation areas.

**Borough's housing needs** – The borough does have a significant housing need, and we don't have sufficient land. Surrey County Council Adult Social Care recognises that further extra-care accommodation is required. But this development alone would produce 91 or 57 units more than we will need right up to 2035, and since the need was assessed, we have an additional 113 similar properties either already built or with planning permission. An older living development a couple of miles down the road in a neighbouring borough, completed over 4 years ago, has only managed to fill about half of their apartments. Even the applicant says it is likely to attract many people living outside the Borough – thus contributing little to our housing need and not freeing up much needed housing for local people.

Since the borough and surrounding areas have a surfeit of assisted living accommodation that, despite Mr Warren's assertion of greater need, developers are unable to fill, if this development were to be approved, an option could be for the apartments to be converted to other forms of housing. However, many would be unsuitable as they are not up to national space standards, and lack sufficient private amenity space. The parking provision would also be very significantly below the minimum requirements. Over provision and lack of flexibility are contrary to the Council's Policy DM21. Even as currently proposed, many units don't meet the minimum space standards let alone the greater space needed for wheelchair users. Many lack sufficient amenity space - apparently to encourage residents to use the communal areas – but surely residents need enough space of their own, especially following Covid experiences, and they should be able to choose how and where to spend their time. As stated in the opening addresses – this type of living is designed to enable residents to retain their independence.

The affordable housing requirements have not been met. The borough requires 40% affordable units, and the 24 units proposed are only replacing the 24 hospital workers' flats that were on the site which the developer recently demolished.

**Other amenities on site** – Concern has been raised about the lack of sufficient parking. Whilst appreciating that we are striving to reduce dependence on car ownership, it can be expected that there would be a significantly greater car ownership than the number of parking places provided. In addition, it is likely that the elderly residents would have a significant number of visitors, for instance families, many of whom would drive to see them. There is already extreme pressure on parking in surrounding roads and it seems very unlikely that there would be sufficient space for visitors to park on site. The automatic parking system is also likely to be a significant deterrent for visitors who will also try and park in surrounding residential streets resulting in loss of residential amenity to existing residents.

I believe the developers are negotiating to move the shops currently within the hospital to the Guild Living complex. The proposed café is promoted as an asset for the hospital. The hospital already has a cafe. So, these are not new services, just potentially profitable ones the developer wants to take over. As to the suggestion that the shops in the proposed development would not be permitted to sell food, in order to discourage people from driving to the site to shop, I cannot see that working as an enforceable condition.

I also have concerns about the position of the nursery in the second proposal. For this, the children's outdoor play area is facing into the complex. The youngsters be in full view of those walking through and, more significantly, will be overlooked by many of the apartments. With concerns about safeguarding, many nurseries and other children's facilities now screen their outdoor areas from prying eyes. There could be some screening to discourage viewing at ground level, but the potential overlooking from the higher apartments could be a serious concern.

Overall I believe that both of the current proposals and the minor modifications are an overdevelopment of this site; they will irreparably damage the character of the area and result in significant harm to surrounding residential amenity; they do not address our priority housing needs; and the additional facilities are inappropriate. I urge you to uphold the decision of Epsom & Ewell Borough Council and to dismiss this appeal.

Thank you

