

**Epsom and Ewell Borough Council**

Town Hall  
The Parade  
Epsom  
Surrey  
KT18 5BY

London  
Holmes House  
4 Pear Place  
London SE1 8BT

[nexusplanning.co.uk](http://nexusplanning.co.uk)

13 October 2020

Dear Ginny,

Ref: 34536-03

**Planning application reference: 19/01722/FUL**

**Address: Epsom General Hospital, Dorking Road, Epsom, Surrey, KT18 7EG**

Please find herewith our response to the queries raised following the presentation to the members of the planning committee on Wednesday 7 October 2020.

We have also provided, as referenced in the presentation copies of the following reports and publications.

- Homes for Later Living Report 2019
- Health Care Benefits Southampton CC and Housing LIN 2019
- Aston / Lancaster University Measuring Outcomes for Healthy Ageing 2019
- Maximising the Longevity Dividend – International Longevity Centre UK

In addition the information referenced above, the presentation to members also made reference to the following documents that were submitted with the planning application (we have not re-provided copies of these as they are available on the planning register):

- Care Needs Assessment
- Planning Policy Assessment
- Statement of Community involvement
- Transport Statement & Travel Plan
- Design and Access Statement
- Heritage and Townscape Visual Impact Assessment

Our comments to the specific queries raised are set out below.

## **Principle of C2 development**

### **Clarification of local need and how this was determined by the applicant.**

Guild Living have instructed Carterwood, analysts in the care sector, to assess the level of demand and supply in the local area. The assessment, reviews the relevant strategy documentation from Surrey County Council's commissioning group and assesses the existing and planned supply of care schemes within the catchment area against demographic need.

The Carterwood assessment uses a figure of 40 people per thousand over the age of 65, which is the proportion of the population who generally seek this form of accommodation, the remaining proportion seeking other forms of accommodation such as care homes, sheltered housing or staying in their own homes. The methodology employed is the same used by the Council's consultants in preparing their SHMA analysis (Strategic Housing for Older People Resource Pack (SHOP)).

In collaboration with the Associated Retirement Community Operators (ARCO) and its members Carterwood undertook national research project to calculate the distance travelled by extra care housing residents from their last place of residence. The research concluded that circa 69 per cent of residents travelled within 10 miles. At the request of Surrey County Council Social Care Commissioning we have reduced our usual 10-mile market catchment for extra care assessment to a 5-mile market catchment and have also provided a circa 3-mile market sensitivity analysis catchment to assess more local demand and supply.

The analysis shows there to be a significant existing (at 2022) unmet need for 459 private extra care units within the 3-mile market catchment area (which accords closely to the Epsom and Ewell Borough Council area). This need increases to 1,056 private extra care units within the market sensitivity catchment (within 5 miles of the site). This assessment includes all of the existing provision as well as all planned units and units under construction and therefore represents the maximum supply of units and accordingly provides a robust case for the residual need for new units taking existing and proposed supply into account.

The assessment shows that this need will rise to 548 and 1,295 private extra care units within the 3 mile and 5 mile catchments respectively by 2025, and will increase further to 1,441 and 587 by 2028.

For further information please refer to the Care Needs Assessment which was submitted with the application.

## **Highways and car parking**

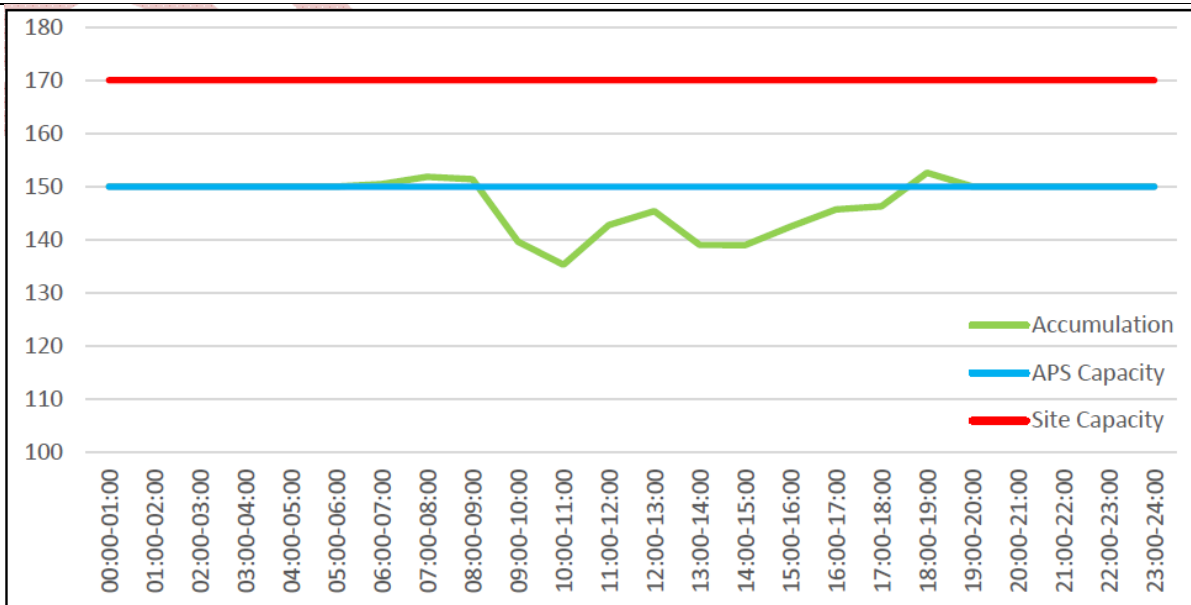
### **Clarification as to whether the level of visitor and staff car parking spaces is sufficient.**

The two-storey Automatic Parking System (APS) provides onsite parking for residents, staff & visitors. The APS will have a total of 150 spaces with the following proposed allocation:

- 120 spaces for residents (only 40% of the 306 Guild Living Residences will be marketed/sold as having parking spaces);
- 20 spaces for visitors; and
- 10 spaces for staff (up to 35 staff on site, with a maximum of 7 overnight).
- Further parking for visitors is provided at grade for up to 20 vehicles along the western boundary of the site.

We have assessed the occupancy of visitors and staff to ensure sufficient parking, the method approved by Surrey County Council, predicts parking accumulation based on arrivals and departures for residents staff and visitors.

This assessment assumed that the APS would be full overnight, although in reality this is extremely unlikely the predicted accumulation is illustrated below, which shows (green line) that the site is not likely to reach capacity.



Surrey County Council have approved the level of parking proposed for the development and have stated that the existing parking restrictions in place in the surrounding area will avoid any issues with illegal parking in streets around the site.

It is also worth noting that the legal agreement attached to the planning permission will secure a travel plan to reduce reliance on car use. In addition the scheme provides two car club spaces, a minibus to transport staff and residents. The scheme will also make contributions to improvements to the bus shelters and provide real time bus travel information.

## **Climate change**

### **How does this development incorporate sustainability?**

The approach to energy results in carbon reduction of 462 kg CO<sub>2</sub> per year (48% improvement on Building Regulations).

Key sustainability measures include

- High efficiency air source heat pumps for heating, cooling, and hot water
- High-performing façade reduces the energy demand and limits the overheating
- High efficiency mechanical ventilation with heat recovery
- LED lighting throughout.
- Electric heating i.e. no gas supply to the site minimising air quality impacts and allowing electric heating from fully renewable sources in the future.
- Guild are looking to source direct purchase of electricity from certified renewable energy.
- Very high efficiency photovoltaic panels provide 282kWp renewable energy to the development
- Extensive green landscaping and green roofs provided throughout the site.

Guild Living are designing all their buildings to meet and exceed the Royal Institute of British Architects 2030 climate challenge and the LETI Climate Emergency Design Guides. The building is 20% below the current RIBA Benchmark, we are investigating additional design interventions to reduce this to 24%.

### **Given L&G is a partner, will this development be carbon neutral in the future?**

Guild have had both operational and embedded carbon footprints modelled at Epsom and it is their intention for all their buildings to be net zero Carbon by 2025.

## **Trees, landscaping and ecology**

### **Will new trees mature and take effect, to ensure proper screening? How will the scheme be managed in the long-term?**

#### *Proposed trees*

- All standard trees proposed to be planted at 5/6m tall and three feature trees proposed will be planted at 8m to ensure instant impact on site is achieved.
- All proposed trees will be planted in soil cells to ensure the longevity of the trees.
- All proposed trees will have approx. 10/15 cubic meters of soil to ensure optimal health and longevity of trees
- Standard trees will grow approx. 12m tall. Specimen trees will grow approx. 16m tall.

#### *Maintenance*

- A proposed weekly maintenance schedule has been drawn to ensure all trees and vegetation are well managed. The schedule includes all proposed trees.
- Detailed Irrigation plan has also been drawn to ensure all trees are correctly irrigated to ensure trees will be healthy

In addition to the tree planting proposals the scheme incorporates wild-flower green roofs, incorporating 36 native wild-flower species, which will provide a valuable ecological habitat for the site and surrounding ecology.

Ecological planning to the site will support and increase ecology and biodiversity site-wide. Approx. 35 different plant species will help encourage the population of pollinators and other ecology species within and surrounding the site.

## **Social and community benefits**

### **Clarification of National planning policies that support community infrastructure**

Policy CS12 calls for developers to demonstrate that the service and community infrastructure necessary to serve the development is available, and to make the necessary provision where there is an existing shortage or where development will exacerbate under provision

Policy CS13 calls for the loss of community facilities, particularly those for young and old, and supports the provision of new community facilities.

Policy DM34 calls for new and extension to existing social infrastructure, in multi-use, flexible and adaptable buildings, in accessible locations and where of high design quality.

Policy DM21, the proposed older persons living community on the Epsom Hospital Site be an exemplar in terms of the standard of facilities and in the provision of support and care

Paragraph 8 of the NPPF sets out the objectives for sustainable development, which includes the need to support vibrant and healthy communities

Paragraph 91 of the NPPF calls for decisions should aim to achieve healthy, inclusive and safe places which; promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other and where this would enable and support healthy lifestyles

Paragraph 121 of the NPPF states that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.

**Clarification of social and community benefits of this scheme and what weight can be attached to this, within the planning balance.**

Some of the benefits from extra care accommodation, set out in the application and supporting documents, include:

- Improving wellbeing and social interaction, offering better health outcomes and reducing healthcare costs.
  - 46 % reduction in planned GP visits (*Aston / Lancaster University Measuring Outcomes for Healthy Aging (2019)*)
  - £3,500 savings per person to the NHS and Social Services (*Homes for Later Living Report (2019)*)
  - £2,115 savings from reducing hospital stays from 5.7 days to 1-2 days (*Health Care Benefits Southampton CC & Housing LIN 2019*)
- Reducing loneliness and isolation within the elderly community.
- Integrating the care facilities into the local community through the shared use of services.
- Supporting the local hospitals through the provision of transitional care and step-down services.
- Providing open space and improved connection between the Millennium Green and the Hospital

**Affordable housing**

**Further information required about the affordable housing offer and re-provision of key worker accommodation. How will the key worker housing be managed?**

24 units of Affordable Housing accommodation for Key Worker Accommodation will be provided on site, this will be secured in the Section 106 Agreement.

Key Worker Accommodation will be designated for employees or a person in the employment of any National Health Service entity.

The units will be rented at no more than 80% of the local Open Market Rent.

The units will be managed by NHS St Kilda Trust who will have a 250 year lease over the units

The scheme will also provide 21 C2 Affordable Units (Use Class C2), again on site these will comprise:

- 16 Affordable Rent units (rented at 80% of market rental levels)
- 5 Shared Ownership units (sold at 75% of the open market valuation)

The C2 units will be provided for eligible persons identified within the Authorities Housing List

**Applicant's justification for affordable housing offer?**

The Affordable Housing Offer has been made on the basis of a Viability Assessment which has been reviewed by the Council's independent viability consultants.

**Visual impact**

**Further information required about the scheme's design, in terms of heights**

The buildings along Woodcote Green Road, currently comprise Rowan House, which is 18.4 m in height, Woodcote Lodge with is 10.8m in height, York House. The scheme will have two buildings

fronting onto Woodcote Green Road, which are 14.3 m in height (east block) and 19.5 m in height (west block).

Both the east and the west buildings rise up to 9 storeys (32.9m high). The west building has a lower four storey element along the west boundary of the site, which is 13.2 m high, and a lower two storey podium level at 8.1 m in height.

The existing hospital rises to 29.83 to the top of the large rooftop plant structures, thus the proposed Guild Living development will, at its tallest elements be some 3 metres taller than the hospital.

Full details of the schemes details and the heights of the various elements are shown on the sections and elevations with further details in the Design and Access Statement.

**How does the design of this scheme relate to the two-storey traditional suburban housing, particularly on Woodcote Green Road?**

Woodcote Lodge which is the 3 storey building on the west of the site, fronting onto Woodcote Green Road is situated 9.2 metres from the house to the west, the proposed development increases this setback to 14.5 metres. Other setbacks are in excess of 30 metres to ensure a suitable distance to address amenity concerns.

The proposed scheme will be higher than the two storey buildings to the west of the site, however it must be borne in mind that the existing site buildings are also (heights mentioned above) also taller than the adjacent two storey homes. There is an increase in height along the western boundary, however the use of landscaping and generous setbacks which are generally more than 30 metres protects neighbouring amenity.

**Can angles/visuals be provided?**

A number of visuals are contained within the Heritage Townscape Visual Impact Assessment and the Design and Access Statement, which were provided with the application. The angles of the visuals were agreed with officers prior to the submission of the application and provide an analysis from 360 degrees around the site.

We have provided a further visual which provides additional detail of the interface between the site and the two storey dwellings to the west of the site.

**Impact on neighbouring amenity**

**Will the lower elements of this scheme overlook gardens of adjacent neighbours?**

There are a number of units which will be orientated to the west of the site, for the most part units are orientated within the site, over internal courtyards, the podium amenity space, towards the millennium green to the south, as well as north and east. For the most part gardens are screened by dense vegetation. The additional visual provided herewith, shows the combination of large (20 m tall) existing tree and additional tree planting along the boundary.

**Particular reference to the two storey open space on the west side**

As mentioned above, a further visual which provides additional detail of the interface between the site and the two storey dwellings to the west of the site.

**Clarification of heights and distances to neighbouring properties required**

We have provided additional drawings which illustrate the existing and proposed distances of buildings on the site to the neighbouring properties, the heights of the proposed buildings are set out above.

## **NHS funding arrangement**

### **What is the funding arrangement?**

Final funding arrangements are to be agreed with the NHS, following securing a planning permission around a year prior to the occupation of the site.

At Epsom we will have 28 higher care beds (referenced within the application as Guild Care Suites). Registered with the Care Quality Commission, this area of our community will cater for those with a greater level of need or support, and where a higher level of dependency is required.

The service will be registered to provide personal and nursing care, with experienced teams trained to support those with who have cognitive decline.

We will always endeavour to support the wider area and local health economy in any way we can. This could be opening our support groups to local residents, enabling access for NHS physiotherapy teams to use our hydrotherapy pool or functional equipment, or to look at a hospital step down / intermediate care solution.

This could be facilitated through developing an understanding of where our higher care service could support discharging hospital patients where it was safe to do so. With our expertise and focus on cognitive care or our specialist reablement team, we could set aside a set number of beds to enable the hospital to use these around a set of agreed conditions, as and when required.

Our intention is to maintain regular dialogue with the local NHS trust so we can assist in providing step down beds if there is need within the local NHS and availability within the higher care beds within the care floor. The beds would be secured through a funding agreement (for example a fixed term rental basis) between the NHS Trust and Guild agreed at the time that the beds are required.

## **Millennium pond, Woodcote Green**

### **What support will be offered to the Trust of this area, to the south of the Site?**

Guild Living would be prepared, as has been discussed with the Woodcote Millennium Green Trust, to assist in the ongoing repairs and maintenance and to support the trust in replacement costs of equipment such as litter pickers and protection equipment such as gloves and eye wear etc.

### **A maintenance contribution would be appropriate**

The Woodcote Millennium Green Trust has advised Guild Living that, based on their assessment of the increased use of the Millennium Green, which would in turn result in additional costs of £1,700 per year (or £25,500 over a 15 year period)

Guild Living would be able to provide a £25,500 contribution for the ongoing maintenance of the Millennium Green which could be secured via S106.

## **Engagement with local residents**

### **What engagement has been taken with local residents to date?**

Since the Summer of 2019, Guild Living has undertaken extensive engagement with the local community, including involved numerous events and five public consultations, exhibitions meetings, media publicity, ongoing correspondence with residents and community groups, as well as working with local charities.

Guild Living held five public consultation events, invitations to these events were sent to over 20,000 households and letters posted to local residents and groups around the site:

- Epsom Fun Day, 15 September 2019
- Epsom Market, 10 October 2019

- Epsom Hospital, 12 October 2019
- Bourne Hall, 15 October 2019
- Stoneleigh Library, 22 October 2019

Local residents have also been informed of progress through a number of press releases published by the local media such as Surrey Live, Surrey Comet and What's On in Epsom:

- 15th October 2019 – articles regarding Guild's consultation events
- 22nd October 2019 – article regarding Guild's plans for Epsom
- 12th February 2020 – article regarding Guild's planning application submission
- 30th June 2020 – articles regarding Guild's landscape investment

Since summer 2020, Guild Living have worked closely with their contractor Morgan Sindall to keep neighbouring residents informed of site works.

Morgan Sindall have prepared a comprehensive community engagement plan, which includes:

- Appointing a dedicated Community Investment Manager to act as a point of contact for local residents.
- Ongoing letters and emails to neighbouring residents and community groups regarding site works (May 2020, September 2020, October 2020).
- Setting up a dedicated website to provide information on the site works.
- Establishing a series of community forums to answer queries from neighbouring residents.

### **Management of Site**

#### **How will the Site be managed? Clarification of management between the hospital and this Site**

Guild Living to manage and operate the site.

Guild living will be willing to commit to a planning condition which will secure the management of the site and landscaping for a period of five years, as is normal practice.

Guild Living will be in regular contact with the NHS as a key neighbour over the lifespan of the project.

I trust that the above and the accompanying documents provide a useful response to the questions raised by members on 7 October 2020. Should you require any additional information please do not hesitate to contact the undersigned.

Yours sincerely



Tim Spencer  
Associate Director