

Epsom and Ewell Borough Council

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Surrey
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London
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nexusplanning.co.uk

23 September 2020

Dear Ginny,

Planning application reference: 19/01722/FUL

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

We write on behalf of our client, Senior Living Urban (Epsom) Limited ("the Applicant"), with respect to application reference 19/01722/FUL and the public comments received during the consultation period in relation to the development proposal at the above site.

In addition to the more comprehensive details provided in the application documents, which deal with the matters below in detail, this letter intends to provide a brief overview respond to the public consultation comments. These are addressed in response to the key themes identified in turn below.

Public Consultation Responses

The public consultation process received a total of 603 responses. Although the majority of the comments cited objections to the proposals (one supporting comment was received as well as a number of neutral comments) many did acknowledge that there is a need for extra care accommodation within Epsom and Ewell Borough.

In addition to the public comments, comments were also received from the following residents' association groups:

- Woodcote Residents' Society; and
- Epsom Civic Society.

Due to the repetition of the key themes raised, the points are addressed below.

[London](#)

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[Reading](#)

Principle of development

As mentioned above, the majority of comments received identified that there is local support for the provision of extra care facilities at the site. It has also been acknowledged that there is a need for extra care facilities within the Borough. This need is set out within the submitted Planning Statement, the accompanying Care Needs Assessment and has been confirmed by Surrey County Council.

Design and Massing (including character)

The development proposals have been designed by Marchese Partners, who are recognised as global leaders in the high quality design of extra care facilities. As detailed within the Design and Access Statement the proposals have been designed in response to the surrounding character whilst responding to the sites constraints and opportunities.

Prior to submission the application underwent a thorough pre-application engagement with Epsom and Ewell Borough Council which considered and responded to design comments.

With regard to the scale and massing the scheme responds to the Council's DPD (Optimising Housing Delivery) to ensure that the borough's housing need is addressed whilst respecting the local character and site constraints.

The Council's Report titled Making Efficient Use of land calls on decision makers to fully optimise sites that are available, deliverable and developable (refer para 3.1). It states that some sites will be developed for higher densities and taller buildings than would have been permitted under existing policies.

Members of the planning committee are directed under para 3.3 to attribute greater weight to the need to deliver new additional homes. Para 3.5 goes further and states that proposals that don't optimise capacity of sites should not be positively considered.

Accordingly policy DM13 is to be afforded significantly reduced weight in the determination of the application, with the need to deliver housing on well located (brownfield) sites such as the subject site carrying far greater weight in accordance with National Planning Policy

The application scheme has been informed by a Heritage Townscape Visual Impact Assessment, Sunlight and Daylight Assessment etc, which resulted in the height and scale of development reduced prior to the submission of the application. As set out in the planning statement and the various supporting documents, the proposals are considered to respond successfully to the scale and appearance of the Epsom Hospital and the local environment taking heritage, landscape and residential amenity considerations into account.

Prior to submission the scheme underwent several public consultation events, following the public comments received the overall scale and mass was reduced in response to the comments.

It is considered that the design and mass is of a high quality design that has responded to local views whilst according with relevant planning policy.

Height

The height of the proposal has been informed by the pre-application process with the Council and the public consultation that were undertaken prior to submission. Further guidance was taken from the Council's Issues

and Options Consultation which identifies that locations suitable for higher buildings include town centres, sites in proximity to railway stations; and sites located along transport corridors.

The greatest building heights are located to the rear (north) of the site, complimenting the existing taller hospital buildings, and shielding the least attractive facades of the existing hospital buildings. The taller elements of the scheme are concentrated to the north, with heights reducing to the south, to reflect those of existing buildings on the site and to provide a suitable interface with the residential environment along Woodcote Green Road, and to provide an appropriate response to visual and townscape considerations and local heritage assets and conservation areas.

It should be noted that the heights of the buildings were reduced significantly following the public consultation and have been informed by pre-application discussions with Council's officers.

Parking and Highways Implications

The development includes the provision of 170 on site car parking spaces. Following the public consultation event it was identified that there was concern over the number of space, which was 148, and the potential for overspill on the surrounding residential street. The number of parking spaces was consequently increased in response to this.

Travel to the site will be managed through a Travel Plan, and a Parking Management Plan will be secured as a planning condition and would ensure that there is not a negative impact on the surrounding residents.

Outlook (daylight / sunlight)

A comprehensive Daylight and Sunlight Impact Assessment and Internal Daylight and Sunlight Analysis has been submitted as part of the application. Although there will be some impact on a small number of adjacent properties, overall the assessments demonstrate a high level of compliance to the best practice guidance, demonstrating that the majority of neighbours will not be significantly affected. For the immediately adjacent properties, there would be some isolated daylight transgressions which are below the recommended guidelines. For the majority of cases the rooms affected are likely to be secondary/non-habitable space, or relate to dual-aspect rooms with mitigating light, such that the retained levels of light are considered acceptable.

Affordable Housing

As set out in detail within the submitted Planning Statement the care community use falls within use Class C2 of the Use Classes Order. Further the scheme provides a significant proportion of its floor-space for communal spaces and offering high levels of care and support and accordingly the scheme cannot contribute to affordable housing and other obligations in the same way as might a Class C3 residential scheme with less non-sales floor-space and offering more limited care.

Notwithstanding it has been proposed to provide 21 units on an affordable basis, the final details of which are to be resolved in the legal agreement. It should also be noted that the existing key worker units, which are considered to be broadly consistent with Council's definition of Affordable Rent set out in the Developer Contribution SPD.

Summary

This letter provides a response to core planning considerations raised in the public comments received during the public consultation process for application 19/01722/FUL. It is acknowledged that there is a clear need for the provision of extra care facilities within the Borough and that the proposals will provide benefits to the wider community.

Yours sincerely

Tim Spencer
Associate Director