



GUILD LIVING EPSOM
TOWNSCAPE COMMENTS
7 APRIL 2021

1. INTRODUCTION

- 1.1. This note considers the Epsom and Ewell Borough Council Conservation and Design Comments dated 16 March 2021 written by Lance Penman in respect of the revised planning application reference 21/00252/FUL.
- 1.2. These comments are set out in reference to the structure of the consultation response and reference is made to both the submitted Heritage, Townscape and Visual Impact Assessment (Donald Insall Associates) and separate Scheme Audit (Define).

2. CONTEXT

- 2.1. The consultation response identifies that the proposed development “*may be just visible*” from the junction of Chalk Lane and Woodcote Road and that some more distant listed buildings may be affected by the taller buildings in their long views and that the reduction in height have significantly reduced this.
- 2.2. This description is inaccurate, and imprecise and hence needs to be amended by the Officer. A detailed HTVIA has been produced that examines these matters in a high degree of detail and confirms that in the majority there are no townscape or conservation harm arising, largely due to very low visibility of the revised scheme. It concludes that only low levels of less than substantial heritage harm apply to Chalk Lane Conservation Area and Westgate House. As such, the consultation response wrongly makes a statement that “there are some more distant listed buildings which may be affected”, which is at odds with the technical material submitted and hence is unjustified.

3. COMMENTS

- 3.1. The response states that the majority of the buildings are “*still 8 storey*” without mentioning the specific height reductions and how these are perceived from local vantage points. This is a fundamental oversight - height and mass only become relevant to townscape and visual in the way they are perceived. This is a further unhelpful and imprecise point. Reference should be made to the site being located within townscape character

area 35E, as set out in the Council's 2008 Environmental Character Study and in particular its stated ability to accommodate change due to its *"lack of intactness"*.

- 3.2. A summary should be provided as to how the scale and massing of the proposed scheme has changed and what effects arise. This subject is addressed in detail in the HTVIA and the Scheme Audit, the latter concluding the following at it page 24:

The townscape character areas relating to the site are defined in Epsom and Ewell Environmental Character study as discussed in section 2. Whilst there are missing elements it's reasonable to identify key receptors as TCAs 35, 36, 37.

Area 35(E) is the Epsom Hospital site (including the Guild Living Site) & no 40, 42, 44 & 46 Woodcote Green Road.

*Area 36 is the area to the west including Hylands Road, Digdens Rise & Woodcote Side
Area 37 is the Woodcote Park Estate.*

In summary we find the revised scheme to bring a beneficial effect to Character Area 35, a neutral effect to Character Area 36, and a beneficial effect to area 37 and therefore in respect of this specific consideration, the proposed development (by reason of its height, mass, scale and design) would positively impact the character and appearance of the area and would be in accordance with relevant planning policies.

- 3.3. The response goes on to claim that the building will be visible from a substantial distance away. This is incorrect. In the context of townscape and visual assessment, the visual envelope does not extend much farther than 500 metres from the site (HTVIA Plate 36 page 46). This cannot be considered as being a substantial distance - views below 500 metres in distance should be described as being mid-range in nature.
- 3.4. The response goes on to claim that the *"impact will be evident"*, but there is no reference to what type of impact is being referred to (heritage, townscape or visual), how this is assessed and is entirely unsubstantiated. Any reference to impact should be precise, and be in the context of the formal HTVIA that has been submitted. It goes on to state the *"harm will be less than substantial"* but again there is no reference to what harm this claims to reflect and how it is manifest.
- 3.5. The submitted HTVIA sets out its conclusions on townscape, visual and heritage harm concluding:

1. No harm to a range of heritage assets with only low levels of less than substantial harm to the Chalk Lane Conservation Area, Westgate House and Listed Buildings on Dorking Road.
 2. Negligible or no impact on townscape receptors aside from minor adverse to negligible effect on the Millennium Green area and minor adverse effect on residential are to the west of the site lining Woodcote Green Road.
 3. Of the fifteen visual receptors assessed (the majority being within 500 metres, some extending to 1.5km from the site), eleven either have no impact, a negligible impact or a minor adverse/negligible impact, two have a minor adverse impact and two have a moderate adverse impact. No visual effects are significant or major in nature, with the more distant views having no impact.
- 3.4. Furthermore, the Scheme Audit identifies three further townscape receptors arising from the Council's 2008 Environmental Character Study (TCAs 35(E), 36 and 37. It finds that the proposed scheme has a beneficial effect on areas 35(E) and 37 and a neutral effect on area 36.
- 3.5. The response goes on to claim that the landscape scheme "*remains largely unchanged*", which is highly misleading. The change to the Woodcote Green Road frontage is highly significant and should be referred to and explained as such - this is communicated at pages 25-29 of the Scheme Audit document submitted with the application, which makes it clear how significant the design refinement is, and the improvements is delivers.
- 3.6. Finally, this section makes reference to the amenity space and play area which is described as being "*cut off from the rest of the public space*" with the play area segregated. The play area sits next to the childcare facility and is part of the wider plaza area, within which a very low trafficked and low speed drop off vehicular route does exist. This arrangement appears to be an optimal solution - the play area is a natural extension of the child care facility and will be perceived as being part of the public plaza but with appropriate separation and protection in place.

4. CONCLUSIONS

- 4.1. The conclusions claim the proposals remain a "*very substantial massing*" without being clear on what is meant by this term. It is imprecise and requires further justification and explanation, especially given that the submitted HTVIA and Scheme Audit provide clear and detailed conclusions in respect of how successful the massing changes are. Refer-

ence to heritage impacts being less than substantial is made, but no meaningful analysis of the townscape and visual effects are provided. For example, no mention is made of how significant and notable the scheme changes are when perceived from key local viewpoints. The Scheme Audit at pages 16, 18 and 23 make it very clear just how much of a change will be perceived, to the degree that a number of these changes will now be beneficial in nature.

- 4.2. It is highly alarming that these key changes to the scheme are not referenced at all in this consultation response - these changes are key in addressing the reasons for refusal of the previous scheme, and hence should form the primary focus of the Officer's consultation response. The response would need to be amended to providing comprehensive analyses of these changes.
- 4.3. The conclusions go on to state that the impact of the scheme on green space "*on the other side of Dorking Road will be significant as a marker to its edge*" is presumably referring to viewpoint 8 (see HTVIA pages 63/64 and 117). It goes on to state "*but not a harmful one*". This is a balanced conclusion, but claiming this impact is significant is poor use of language and could easily be misinterpreted - as such, the Officer's consultation response should be amended accordingly to avoid any confusion.

5. ANALYSIS

- 5.1. Overall, it is considered that the consultation response is imprecise and does not grapple objectively with the material that has been submitted with the revised scheme to address the previous reasons for refusal. Of particular note is how the revised scheme has made substantial changes to its massing, relationship with Woodcote Green Road and much more sympathetic materials. These changes greatly assist in assimilating within the local townscape and visual context and delivering notable benefits. This information is central to the consideration of the revised scheme and should be thoroughly explained and communicated. Unfortunately it is not addressed or described in any clear detail. Instead the nature of the response and the language it uses is vague, negative and in some cases inaccurate.
- 5.2. A more detailed analysis of the reasons for refusal in respect of heritage, townscape and visual terms is required, with reference to the detailed technical material provided and a conclusion given with total clarity as to whether there is or is not a reasons for refusal in those terms. There is not a reasonable interpretation that gives ground for an objection on the basis of townscape and visual grounds.

6. SUGGESTED PLANNING CONDITIONS

- 6.1. On 1 April 2021 Nexus Planning provided the Council with the Draft Planning Conditions (Rev 1), which included the proposed changes to the proposed conditions on design matters.

A Williams
7 April 2021