



NEXUS
PLANNING

Epsom Hospital Site, Dorking Road, Epsom, KT18 7EG

Planning Statement

On behalf of Senior Living Urban (Epsom) Limited

February 2021

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1 Introduction

- 1.1 This Planning Statement has been prepared by Nexus Planning on behalf of Senior Living (Epsom) Limited (the Applicant) to accompany a full planning application for the updated development proposals for the redevelopment of land at Epsom Hospital Site, Dorking Road, Epsom, KT18 7EG.

Description of Development

- 1.2 The proposed description of development is as follows:

Demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people arranged in two buildings, comprising 267 care residences, 10 care apartments and 28 care suites providing transitional care, together with ancillary communal and support services within Use Class C2, 24 key worker units within Use Class C3, childrens nursery within Use Class E, as well as associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space.

- 1.3 This planning application is a resubmission which updates the previous application for full planning permission which was submitted to Epsom and Ewell Borough Council ("the Council") on 27th January 2020 (application reference is 19/01722/FUL) and was determined on 18th November 2020.
- 1.4 The previous application (19/01722/FUL) was recommended for approval by the Planning Officers, however, the officer recommendation for approval was overturned by the planning committee on 18th November 2020, and planning permission was therefore not granted. The following reasons for refusal were provided by the planning committee:

- (1) The proposed development by reason of its height, mass, scale and design would adversely impact and harm the character and appearance of the area (including the built environment and landscape setting), failing to comply with Policy CS5 of the Core Strategy (2007), Policies DM9, DM10 and DM11 of the Development Management Policies Document (2015) and paragraphs 122 and 127 of the NPPF (2019).
- (2) The siting of the development leaves insufficient landscaping opportunities to the frontage of Woodcote Green Road and along the south-western boundary with neighbouring residential property to mitigate the impact of the proposed development, presenting an over-developed and hard edge to the appearance to the development which would cause

harm to the character and appearance of the area. Causing harm to the character and appearance of the area fails to comply with Policies DM5 of the Development Management Policies Document (2015) and the NPPF (2019).

(3) The proposed development by reason of its height, massing and design would adversely impact on the neighbouring amenities of the occupiers of 40 and 46 Woodcote Green Road, by means of overbearing, loss of privacy and loss of outlook, failing to comply with Policy DM10 of the Development Management Policies Document (2015).

(4) In the absence of a completed legal obligation under Section 106 of the Town and Country Planning Act 1990 (as amended), to secure an affordable housing contribution the applicant has failed to comply with Policy CS9 (affordable Housing and meeting Housing Needs) of the Core Strategy (2007) and the NPPF (2019).

1.5 This resubmission of the updated development proposals seeks to address the Planning Committee's reasons for refusal as set out above. A summary of the changes to the scheme are set out below:

Height, massing and scale

1.6 The height of all of the proposed buildings has been reduced across the site. The principle change is the reduction of the height of the two taller elements of the east and west blocks by some 6 metres, equivalent to a two storey reduction. The reduction in height has been achieved by removing the uppermost level of accommodation, optimising the construction build-up (by reducing floor to ceiling heights, slab thickness and service runs) and making minor changes to the ground levels. In addition to the reduction in the height of the two tallest elements of the scheme, the height of the frontage building on the western side of the site has been reduced by around 5 metres through the removal of the upper storey fronting Woodcote Green Road, as well as optimising the construction build-up and ground levels. Overall, the optimisation of the construction build-up has allow all of the buildings on the site to be lowered by between 1.7 and 6 metres.

1.7 The overall massing and scale of the proposed buildings has been reduced substantially by reducing the number of units by 39, by reducing the height of all buildings and increasing the setbacks from Woodcote Green Road.

Landscaping

1.8 The setbacks of both proposed frontage buildings from Woodcote Green Road has been increased substantially. The setback of the west building has been increased from 7 metres to 16 metres. The

setback of the east building has been increased from between 2.2 and 5.5 metres to between 5 metres and 10 metres, and an additional step incorporated in the frontage to provide additional depth and articulation to the site frontage.

- 1.9 Along Woodcote Green Road, the increased setbacks have allowed for additional tree and vegetation planting which has significantly increased the planting density and the size of trees along the street edge. This area is further enhanced by a boulevard of trees and seating areas to enliven the streetscape and create an additional area of public realm.
- 1.10 Along the western boundary of the site, the row of perpendicular parking has been reconfigured to parallel parking to both create a wider landscaped buffer with significant additional tree planting along the boundary and to reduce the amount of parking along this edge.
- 1.11 The landscaping proposal across the site has been amended with additional tree planting using mature tree groves and new areas of public realm. In particular the planting has been strengthened along the more sensitive western and southern boundaries of the site. The movement areas within the site have been further enhanced and defined with trees and boundary hedges.

Unit numbers / amount

- 1.12 The number of units proposed in the scheme has been reduced from 344 units of C2 (Accommodation with Care) and 24 units of C3 (Affordable Key Worker Accommodation) to 305 units of C2 (Accommodation with Care) and 24 units of C3 (Affordable Key Worker Accommodation). A total reduction of 39 units.

Design Changes

- 1.13 Changes have been made to the orientation of several windows on the western side of the proposed development to address the potential effect on the privacy of the adjacent residential properties. The materials palette has also been revised to reduce the amount of metal cladding and to change the colour of the cladding to relate more closely the materials of existing buildings in the local area.

Scope of Supporting Information

- 1.14 This Planning Application is supported by several documents and technical reports in accordance with the Council's validation requirements and as agreed with Epsom and Ewell Borough Council (EEBC). All of the supporting documents, which accompanied application 19/01722/FUL, have been updated reflect the details of the current scheme.

1.15 The architects drawings, which set out the details, of the amended scheme are listed below:

- SITE PLANS
 - EPS001-MPI-XX-ZZ-DR-A-00-001 SITE LOCATION PLAN & EXISTING SITE PLAN
 - EPS001-MPI-ZZ-ZZ-DR-A-00-002 PROPOSED SITE PLAN
- DEMOLITION WORKS
 - EPS001-MPI-XX-ZZ-DR-A-00-003 DEMOLITION PLAN
- GENERAL ARRANGEMENT PLANS
 - EPS001-MPI-ZZ-00-DR-A-01-100 LEVEL 00 FLOOR PLAN
 - EPS001-MPI-ZZ-01-DR-A-01-101 LEVEL 01 FLOOR PLAN
 - EPS001-MPI-ZZ-02-DR-A-01-102 LEVEL 02 FLOOR PLAN
 - EPS001-MPI-ZZ-03-DR-A-01-103 LEVEL 03 FLOOR PLAN
 - EPS001-MPI-ZZ-04-DR-A-01-104 LEVEL 04 FLOOR PLAN
 - EPS001-MPI-ZZ-ZZ-DR-A-01-105 LEVEL 05 FLOOR PLAN
 - EPS001-MPI-ZZ-RF-DR-A-01-106 LEVEL ROOF PLAN
 - EPS001-MPI-XX-SX-DR-A-20-200 SITE SECTIONS
 - EPS001-MPI-XX-SX-DR-A-20-201 BUILDING SECTION A-A' & B-B'
 - EPS001-MPI-XX-SX-DR-A-20-202 BUILDING SECTION C-C' & D-D'
 - EPS001-MPI-XX-SX-DR-A-20-203 BUILDING SECTION EE
 - EPS001-MPI-XX-SX-DR-A-20-205 SITE SECTIONS - STREET CONTEXT
 - EPS001-MPI-XX-EL-DR-A-20-300 ELEVATION 1A-1A - BUILDING A SOUTH
 - EPS001-MPI-XX-EL-DR-A-20-301 ELEVATION 1B-1B - BLD B COURTYARD SOUTH
 - EPS001-MPI-XX-EL-DR-A-20-302 ELEVATION 2-2 - BUILDING A PODIUM SOUTH
 - EPS001-MPI-XX-EL-DR-A-20-303 ELEVATION 3-3 - BUILDING A NORTH
 - EPS001-MPI-XX-EL-DR-A-20-304 ELEVATION 4-4 - BUILDING A WEST
 - EPS001-MPI-XX-EL-DR-A-20-305 ELEVATION 5-5 - BUILDING A EAST
 - EPS001-MPI-XX-EL-DR-A-20-306 ELEVATION 6-6 - BUILDING A SOUTH
 - EPS001-MPI-XX-EL-DR-A-20-307 ELEVATION 7-7 - BUILDING A DROP-OFF SOUTH
 - EPS001-MPI-XX-EL-DR-A-20-308 ELEVATION 8-8 - BUILDING B EAST
 - EPS001-MPI-XX-EL-DR-A-20-309 ELEVATION 9-9 - BUILDING B WEST
 - EPS001-MPI-XX-EL-DR-A-20-310 ELEVATION 10-10 - BUILDING A NORTH

- EPS001-MPI-XX-EL-DR-A-20-311 ELEVATION 11-11 - BUILDING B NORTH
- EPS001-MPI-XX-EL-DR-A-20-312 ELEVATION 12-12 - BUILDING A WEST
- EPS001-MPI-XX-EL-DR-A-20-313 ELEVATION 13-13 - BUILDING A PODIUM EAST
- EPS001-MPI-AZ-00-DR-A-20-500 BUILDING A - L00
- EPS001-MPI-AZ-01-DR-A-20-501 BUILDING A - L01
- EPS001-MPI-AZ-02-DR-A-20-502 BUILDING A - L02
- EPS001-MPI-AZ-03-DR-A-20-503 BUILDING A - L03
- EPS001-MPI-AZ-04-DR-A-20-504 BUILDING A - L04
- EPS001-MPI-AZ-ZZ-DR-A-20-505 BUILDING A - L05-07
- EPS001-MPI-AZ-RF-DR-A-20-506 BUILDING A - ROOF LEVEL
- EPS001-MPI-BZ-00-DR-A-20-510 BUILDING B - L00
- EPS001-MPI-BZ-01-DR-A-20-511 BUILDING B - L01
- EPS001-MPI-BZ-02-DR-A-20-512 BUILDING B - L02
- EPS001-MPI-BZ-03-DR-A-20-513 BUILDING B - L03
- EPS001-MPI-BZ-04-DR-A-20-514 BUILDING B - L04
- EPS001-MPI-BZ-ZZ-DR-A-20-515 BUILDING B - L05-07
- EPS001-MPI-BZ-RF-DR-A-20-516 BUILDING B - ROOF LEVEL
- EXTERNAL WALLS
 - EPS001-MPI-XX-XX-DR-A-21-300 TYPICAL BAY STUDY - BAY 1 - JULIET BALC DETAIL
 - EPS001-MPI-XX-XX-DR-A-21-301 TYPICAL BAY STUDY - BAY 2 - BOLT ON BALC DETAIL
 - EPS001-MPI-XX-XX-DR-A-21-302 TYPICAL BAY STUDY - BAY 3 - DROP OFF DETAIL
- TYPICAL UNIT LAYOUTS
 - EPS001-MPI-XX-XX-DR-A-30-100 TYPICAL UNIT LAYOUTS - 1 BED
 - EPS001-MPI-XX-XX-DR-A-30-101 TYPICAL UNIT LAYOUTS - 2 BED
 - EPS001-MPI-XX-XX-DR-A-30-102 TYPICAL UNIT LAYOUTS - 3 BED
 - EPS001-MPI-XX-XX-DR-A-30-103 TYPICAL UNIT LAYOUTS - GCS & GCR

1.16 The landscaping drawings, which set out the details of the updated landscaping scheme are listed below:

- 656_P_00_100 P06 Ground Floor Masterplan
- 656_P_02_105 P02 Roof Masterplan

- 656_S_00_100 P01 landscape General Arrangement Section A-A
- 656_S_00_100 P01 landscape General Arrangement Section B-B

1.17 The application is supported by the following illustrative images and technical reports:

- CGI VIEWS
 - EPS001-MPI-XX-XX-VS-A-00-101 CGI VIEW 01
 - EPS001-MPI-XX-XX-VS-A-00-102 CGI VIEW 02
 - EPS001-MPI-XX-XX-VS-A-00-103 CGI VIEW 03
 - EPS001-MPI-XX-XX-VS-A-00-104 CGI VIEW 04
 - EPS001-MPI-XX-XX-VS-A-00-105 CGI VIEW 05
- Air Quality Assessment
- Archaeological Assessment
- Biodiversity/Ecological Assessment
- Care Needs Assessment
- Construction Management Plan
- Construction Traffic Management Plan
- Contaminated Land Assessment
- Daylight/Sunlight Assessment (and summary compliance letter)
- Design and Access Statement
- Energy and Sustainability Statement (including BREEAM Pre-Assessment)
- Fire Strategy
- Flood Risk Assessment
- Heritage Townscape & Visual Impact Assessment
- Landscaping Scheme
- Lighting Plan
- Noise Impact Assessment
- Statement of Community Involvement
- Sustainable Drainage Statement
- Transport Assessment
- Travel Plan
- Outline Servicing and Waste Management Plan
- Tree Survey/Arboricultural Statement

- Viability Statement
- Operator Statement

1.18 A request for a Screening Opinion (Ref 19/01655/SCR) was submitted to the Council in respect of the previous application, it was determined on 30 December 2019, that the previous scheme did not constitute EIA development. Notwithstanding that the updated scheme reduces the height of the proposed building, reduces the amount of development and number of units, increases building setback and increasing planting and landscaping, a new request for a screening opinion has been submitted to the Council to assess the updated scheme.

Structure of the Statement

1.19 This Planning Statement assesses the updated scheme within the context of the Development Plan, having regard to National and Development Plan policies, as well as allocations and policy designation that apply to the site. The remainder of this statement is set out as follows:

- **Section 2** provides details on the proposed operator and their aspirations for the subject site
- **Section 3** describes the character of the site and the surrounding area and outlines the site's planning history and planning designations
- **Section 4** sets out the strategic and local planning policy context against which the proposals falls to be considered
- **Section 5** sets out the details of the development proposal
- **Section 6** assesses the scheme against the planning policy considerations
- **Section 7** provides an overall conclusion.

2 The Applicant

Senior Living Urban (Epsom) Limited / Legal & General

- 2.1 The application is submitted by *Senior Living Urban (Epsom) Limited*, a private limited company established by Legal and General who are the site owners. A portion of the site, which currently houses the Woodcote Lodge Building is currently owned by St Kilda, the existing Key Worker accommodation provided in Woodcote Lodge is to be re-provided by the applicant.
- 2.2 Legal & General has been involved in housing for nearly 20 years, investing in new homes for all ages, social groups and housing tenures. The later living business was established to tackle the undersupply of age-specific housing – helping to address the spiralling health and social care spend resulting from a lack of appropriate later living accommodation. For the site in Epsom, Legal & General intends to address the local housing needs for an ageing demographic through the delivery of a state-of-art later living development, together with associated communal spaces, care and well-being facilities.
- 2.3 Legal & General has acquired the subject site, following an earlier decision by the NHS Epsom Hospital Trust to sell a portion of the Epsom Hospital Site, which was surplus to their requirements. It is our understanding that the NHS were committed to selling the site to facilitate a use that could foster positive connections with the hospital and to facilitate wider improvements to the hospital site.

Guild Living

- 2.4 Guild Living is the developer and operator through which Legal & General (L&G) is delivering its urban later living developments across the UK. Led by an internationally renowned team of later living design, operation and wellness specialists (with over 50 years of combined industry experience) Guild Living aspire to become a leading provider of urban later living accommodation across the UK. The Guild Living vision is to ensure that every single resident can live *‘their best life’*.
- 2.5 Guild Living’s proposed scheme for the Epsom Hospital site is an innovative concept for later living, aimed at combining beautiful architecture and interior spaces with ground-breaking wellness programmes to enable enriched and active lifestyles for its residents. The scheme will provide a broad range of accommodation catering for the housing needs of Epsom’s older generation. Residents will be able to live independently within a safe, purpose-built environment and with the assurance that there is 24-hour care support available if and when required. There will also be a

diverse range of communal amenities and an array of complementary services, to promote integration and to foster intergenerational activity. These facilities and services will also be available to the general public.

3 Site and Surroundings

- 3.1 The site has an area of approximately 1.5 hectares and is currently occupied by healthcare and accommodation buildings, although most of the site buildings are longer in active use. The site also houses extensive infrastructure such as the laundry, boiler house (with tall chimney) and service buildings, which will be relocated to the retained hospital site. The site also contains several surface car parking spaces located between the various buildings, which continue to be used on short term licence by the NHS.
- 3.2 The, now vacant, NHS buildings on the site comprise;
- a large four storey brick building occupying the frontage to Woodcote Road (Rowan House),
 - a three-storey residential block previously providing doctors' and nurses' accommodation (Woodcote Lodge),
 - the site of a demolished four-storey apartment block formerly used by NHS staff, as well as other office administration buildings (York House),
 - various temporary structures and a boiler house with its associated chimney stack [equivalent of 10 storeys].
- 3.3 All the buildings reflect their previous use and function in connection with the hospital. None are of any architectural merit and none are designated or non-designated heritage assets. In this regard, permission has been granted for the demolition of all of the buildings and structures on the site, (reference: 20/01322/DEM).
- 3.4 Access into the site is directly from Woodcote Green Road, from an access point between Rowan House and Woodcote Lodge and vehicles can then travel through the site to exit to the north of the hospital building onto Dorking Road. The separate access to the Hospital to the east of the site is to remain, and is unaffected by the proposals.
- 3.5 There is very limited vegetation within the site, there are several large mature trees along the northwest edge of the site. There are further (smaller) trees along the frontage with Woodcote Green Road.

Accessibility

- 3.6 The site occupies a highly sustainable position within 800 metres of Epsom town centre, to the north, and just over 1km from Epsom train station (with direct links to London Waterloo, London Bridge and London Victoria). Access to the M25 (Junction 9) is two miles to the south west.
- 3.7 The site is well-connected to public transport with Epsom railway station located within the town centre to the north. There are bus stops immediately adjacent to the site both Dorking Road and on Woodcote Green Road.
- 3.8 Woodcote Green Road is a designated cycle route, a pedestrian link (Madans Walk) connects Woodcote Green Road, a short distance to the north east of the site, to the Town Centre via Rosebery Park.

Surrounding Area

- 3.9 The uses in the area surrounding the site comprise the following:
- To the south of the site is an open space known as Woodcote Millennium Green, which provides a network of open spaces. Further to the south is the private Woodcote Estate comprising large, detached dwellings.
 - Beyond Woodcote Lodge to the west and south-west of the site are two-storey detached and semi-detached dwellings in Woodcote Green Road, Digdens Rise and Hylands Road. The properties on the east side of Digdens Rise and Hylands Road have rear gardens extending to the boundary with the subject site.
 - To the north and east of the site is the remaining hospital land, which is to remain in operation. The hospital buildings range in style, age, quality and height. The tallest building (Wells building), positioned immediately to the north of the subject site, rises to an overall height equivalent to 8 storeys (inclusive of smaller roof structures, which rise an equivalent of 2 storeys above the main roof level).
 - To the east, and occupying the Woodcote Green Road frontage, the buildings drop down to two to three storeys and are set back from the street. There is currently a degree of visual, pedestrian and vehicular permeability between the subject site and the adjoining hospital land.

Site Allocations

- 3.10 The following Local Plan designations apply to the site (as shown on the plan below):

- The site is within the Built-up area of Epsom (light brown wash)
- The open space to the south east forms a designated 'Park and Open Space' and the eastern section of this is subject to a tree preservation order.
- Woodcote Green Road is identified as a designated cycle route (blue line)



3.11 There are no tree preservation orders relating to the site or relating to trees on its boundaries.

3.12 The land contains no designated or non-designated heritage assets. The nearest listed buildings and locally listed buildings are marked purple and blue respectively on the plan below.



3.13 As shown on the Environment Agency flood risk maps, all the site falls within Flood Zone 1 (Lowest Risk).

- 3.14 There are no designated footpaths crossing the site, although there are several informal routes through the land which are used in connection with operation of the hospital.

Planning History

- 3.15 This planning application is a resubmission for full planning permission which was submitted to Epsom and Ewell Borough Council on 27th January 2020. The application reference is 19/01722/FUL.
- 3.16 Application 19/01722/FUL was recommended for approval by the Planning Officer, however, officer recommendation for approval was overturned at planning committee on 18th November 2020, and planning permission was subsequently refused. As summarised at Section 1, this resubmission addresses the reasons for refusal.
- 3.17 The site has also been subject to several planning applications relating to its historic hospital use.
- 3.18 Permission was been granted, in 2020, to demolish all buildings on the site Demolition of the existing buildings and structures on site (Ref. No: 20/01322/DEM).
- 3.19 A full list of the historic planning applications is attached at Appendix 1.

4 Planning Policy

- 4.1 Relevant policies in the Development Plan and in National Policy Guidance have informed the evolution of the development proposal. The implications of these policies and other material considerations are addressed in Section 6 of this statement, which sets out the planning case.

National Planning Policy Framework

- 4.2 The NPPF (July 2019) sets out the Government's planning policies for England and how these should be applied, and is a material consideration in the determination of planning applications.

Sustainable Development

- 4.3 Paragraph 10 of the NPPF sets out a presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a. an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b. a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c. an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The presumption in favour of sustainable development

- 4.4 Paragraph 11 of the NPPF confirms the presumption in favour of sustainable development. For decision makers this means, approving development proposals will accord with an up-to-date development plan without delay. Where the policies which are most important for determining the

application are out-of-date, the Council is directed to grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Consultation

- 4.5 Paragraph 39 promotes early engagement with the local community and other stakeholders noting that this has significant potential to improve the efficiency and effectiveness of the planning application system for all parties: *"Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."*

Housing Choice

- 4.6 The NPPF seeks to significantly boost the supply of homes including providing homes that meet the needs of the population with specific housing requirements, such as older people. Paragraph 61 of the Framework provides the overarching objective in promoting housing choice stating that *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes"* [our underlining].
- 4.7 Older people are defined in the NPPF as *"people over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs."*

Promoting healthy and safe communities

- 4.8 The NPPF promotes the creation of healthy and safe communities. Paragraph 91 states that planning 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 – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

- are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

4.9 Paragraph 92 of the NPPF calls for planning decisions to provide the social, recreational and cultural facilities and services the community needs through the following:

- plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Sustainable Transport

4.10 The NPPF promotes sustainable transport. With regards to highways, Paragraph 108 states that in assessing specific applications for development, it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- safe and suitable access to the site can be achieved for all users; and
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

- 4.11 Paragraph 110 highlights the need to give priority to pedestrian and cycle movements, both within a scheme and with neighbouring areas and to maximise the use of public transport. It also encourages appropriate design to create places, which are safe, secure and attractive, minimising the scope for conflicts between pedestrians and cyclists and vehicles, avoiding unnecessary clutter and responding to local character and design standards.
- 4.12 Paragraph 111 requires that all development that will generate significant amounts of movement should be required to provide a travel plan, and that applications should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Making Effective Use of Land

- 4.13 Paragraph 117 promotes the effective use of land to meet the need for homes and other uses, while safeguarding and improving the environment and creating safe and healthy living conditions. Paragraph 118 notes that *"substantial weight"* should be ascribed to the value of using suitable brownfield land within settlements for homes and other identified needs, and supporting appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The paragraph further notes that the development of under-utilised land and buildings should be promoted and supported, *"...especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively."* Paragraph 121 further states that local planning authorities should support proposals to use retail and employment land for homes in areas of high housing demand, while paragraph 122 states that development should make efficient use of land whilst taking into account the area's prevailing character and setting and the importance of securing well-designed, attractive and healthy places.

Achieving Well-Designed Places

- 4.14 Paragraph 124 encourages the creation of high-quality buildings and places stating that *"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*
- 4.15 Paragraph 125 specifically states that *"Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable."* Paragraph 126 continues by noting that visual tools such as design guides and codes can provide maximum clarity noting that: *"These provide a framework for creating*

distinctive places, with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified."

- 4.16 Paragraph 127 further states that developments should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping (criterion b), sympathetic to local character and history (criterion c), establish or maintain a strong sense of place (criterion d) and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users (criterion f).

Climate Change and Flooding

- 4.17 Paragraph 148 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. Paragraph 50 requires that new development helps to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Paragraph 153 further notes that in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply.
- 4.18 Paragraph 155 notes that where development is necessary in areas at risk of flooding, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 162 sets out the proposed application of the sequential and exceptions tests where planning applications come forward on sites allocated in the development plan.

The Natural Environment

- 4.19 In respect of ecological interests, paragraph 174 seeks to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 4.20 Paragraph 178 requires that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination, including the need for appropriate remediation.

- 4.21 Paragraph 180 further notes that new development should be appropriate for its location taking into account the likely effects of noise and light pollution on health, living conditions and the natural environment.
- 4.22 Each of the above matters are considered further in the new Environment Bill 2019-21.

The Historic Environment

- 4.23 In respect of the historic environment, paragraph 189 states that applicants are required to describe the significance of any heritage assets affected by proposals, including any contribution made by their setting. Paragraph 192 states that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.24 In assessing any harm to heritage assets, paragraph 196 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

National Planning Policy Guidance

- 4.25 The Planning Practice Guidance (NPPG) supports the National Planning Policy Framework and comprises detailed guidance in respect of various matters. With regards to older people's accommodation, the NPPG (consolidated guidance dated 26 June 2019) outlines how local authorities should address the need for older person's housing, stating that:

"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking" (Paragraph 001).

- 4.26 The need to provide housing for older people is described in the NPPG as ‘critical’ as people are living longer lives and the proportion of older people in the population is increasing (paragraph 001).
- 4.27 It is acknowledged that there are different types of specialist housing designed to meet the varying needs of older people which can include age-restricted general market housing, retirement living or sheltered housing, extra care housing or housing-with-care and residential and nursing care homes (paragraph 010).
- 4.28 The NPPG further states that:
- “Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people” (paragraph 006) and that “Innovative and diverse housing models will need to be considered where appropriate” (paragraph 012).*
- 4.29 Having regard to local housing supply, the NPPG categorically states that *“Plan-making authorities will need to count housing provided for older people against their housing requirement”*, although for residential institutions calculations might be based on the average number of adults living in a household (Paragraph 016a).

Local Planning Policy

- 4.30 The relevant Development Plan against which this proposal falls to be considered comprises the Epsom and Ewell Core Strategy (2007) and the Development Management Policies (2016).
- 4.31 In preparing this proposal, consideration has also been given to relevant supplementary planning documents including the Sustainable Design SPD (2016) and the revised Developer Contributions (2014). The Council has published a new policy statement *‘Making the Efficient Use of Land Optimising Housing Delivery 2018’* in response to the publication of the revised National Planning Policy Framework. This is an interim measure to boost housing delivery and give greater certainty to the local plan process.
- 4.32 It is noted that the Council does not have a five-year supply of housing land, with approximately 1 years supply of housing land. The Council has furthermore not met the required levels of housing delivery, and have only delivered 34% of the annual housing need over the last three years, accordingly, on account of both of these points, the ‘tilted balance’ in favour of sustainable development is engaged, in accordance with paragraph 11(d) of the NPPF, which states that *“where*

... the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Core Strategy (2007)

- 4.33 Policy CS3 seeks to conserve and enhance biodiversity in Epsom and Ewell. The policy encourages new development to contribute positively towards the Borough's biodiversity.
- 4.34 Policy CS5 calls on the Council to protect and enhance heritage assets and requires high quality and inclusive design for all developments, which should create attractive, functional and safe environments, should reinforce local distinctiveness and should make effective use of land.
- 4.35 Policy CS6 calls for sustainability in new developments and for development to reduce or to have a neutral impact on pollution and climate change. The Council expects proposals to demonstrate sustainable construction and design.
- 4.36 Policy CS8 calls for development to be located within the built up areas of Epsom and Ewell and within the three hospital cluster sites. The emphasis will be on the re-use of suitable previously developed land for housing. The policy states that, subject to other policies, planning consent will be given for development within built up areas, including infilling, redevelopment and conversion. The policy states further that, in principle, the strategy will be to direct higher density development to central locations, such as Epsom town centre and other local centres, close to existing services and facilities and accessible by public transport, walking and cycling.
- 4.37 Policy CS9 calls for developments to include a mix of dwelling types, sizes and tenures which help meet identified local housing needs. Taking the viability of development into account, the Council will seek to achieve the provision of affordable Housing.
- 4.38 Policy CS13 sets out that the loss of community facilities will be resisted unless:
- it can be demonstrated that there is no longer a need for such a facility in either its current use, or in any other form of community use; or
 - there is an appropriate alternative means of providing an equivalent facility.

- 4.39 Policy CS16 encourages development proposals to foster an improved and integrated transport network and facilitate a shift of emphasis to non-car modes as a means of access to services and facilities.

Development Management Policies (2016)

- 4.40 Policy DM4 sets out that development affecting any site or building that supports species protected by Law, including their habitats, will only be permitted if appropriate mitigation and compensatory measures are agreed to facilitate the survival of the identified species, keep disturbance to a minimum and provide adequate alternative habitats to ensure no net loss of biodiversity.
- 4.41 Policy DM5 sets out that the Borough's trees, hedgerows and other landscape features will be protected and enhanced by (inter alia) requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include the planting of new semi-mature trees and other planting.
- 4.42 Policy DM8 calls on the Council to resist the loss of Heritage Assets and to take every opportunity to conserve and enhance them. The significance of Heritage Assets is to be established as part of the application or consent process.
- 4.43 Policy DM9 sets out that planning permission will be granted for proposals that make a positive contribution to the Borough's visual character and appearance.
- 4.44 Policy DM10 sets out that development proposals will be required to incorporate principles of good design. Development proposals should (inter alia) have regard to the amenities of occupants and neighbours, be adaptable and sustainably designed and have regard to the public realm.
- 4.45 Policy DM11 Housing Density, supports in principle proposals for new housing that make the most efficient use of development sites within the existing urban area. The Council has in adopting its 'Making the Effective Use of Land-Optimising Housing Delivery 2018' significantly reduced the weight afforded to policy DM11, as this policy was considered to restrict the capacity of sites located within the built up areas.
- 4.46 Policy DM13 Building Height, seeks to restrict buildings higher than 12 metres beyond the Epsom Town Centre Boundary. The Council has in adopting its 'Making the Effective Use of Land-Optimising Housing Delivery 2018' significantly reduced the weight afforded to policy DM13, as this policy was considered to restrict the capacity of sites located within the built up areas.

- 4.47 Policy DM17 requires that land affected by contamination only be granted permission for development if there is no escape of contaminants, including during investigation, and that the site will be suitable for development without risk arising from contamination.
- 4.48 Policy DM21 of the Development Management Plan provides a positive context for the provision of new specialist accommodation for older people. A further analysis of Policy DM21 and other relevant policies is provided in Section 6 of this Statement.
- 4.49 Policy DM34 sets out that the net loss of community facilities will be resisted unless:
- the proposal is supported by clear and robust evidence that demonstrates that the facility is no longer needed;
 - where appropriate, it has been vacant and marketed for a community use without success for at least 18 months; or
 - it can be re-provided elsewhere in a different way.
- 4.50 Policy DM36 seeks to secure sustainable transport for new development, through new development providing a travel plan, prioritising the need for pedestrian and cycle access.

Emerging Local Plan

- 4.51 The Council consulted on an Issues and Options document to inform the new Local Plan in September 2017 and carried out a Call for Sites exercise in March 2017 (for which a submission has been made in respect of the subject site). The Council have commenced the preparing of a new Local Plan, the Local Plan preparation process has however been substantially delayed and the regulation 18 consultation which was to have taken place in 2020 has not yet occurred. Accordingly, in terms of paragraph 48 of the NPPF, local authorities may give weight to relevant policies in emerging plan, as policies have not yet been provided for regulation 18 consultation, it is submitted that there are no meaningful policies to which weight can be ascribed in the emerging local plan.

Making the Efficient Use of Land Optimising Housing Delivery 2018

- 4.52 The Council has published a policy statement '*Making the Efficient Use of Land Optimising Housing Delivery 2018*' in response to the publication of the revised NPPF. This policy statement is intended as a measure to boost housing delivery and to give greater certainty to the local plan process. The need for this policy statement is particularly important given the Council's significant shortfall against its 5-year housing land supply and the results of the housing delivery test, which have highlighted the constraints on supply and delivery. The key directive of the policy statement is the

reduced weight afforded to Policies DM11 (Housing Density) and DM13 (Building Heights) of the Development Management Policies which seeks to ensure that developments make optimal use of the potential of each site in contributing towards the housing target. The policy statement provides guidance on the weight which is to be afforded to Policies DM11 and DM13 when determining planning applications.

- 4.53 As set out in paragraph 1.2 of the policy statement, it is intended as an interim measure prepared in response to changes in National Planning Policy Framework in order to boost housing delivery and give greater certainty to the local plan process.
- 4.54 Paragraph 1.3 of the policy statement confirms the new approach, which is to be taken into account in decisions made by the Planning Committee. The new approach is to be deployed to meet the national planning policy requirement to significantly boost housing delivery and optimise land for new housing.”
- 4.55 Paragraph 2.5 confirms that policies DM11 and DM13 could serve to restrict the ‘capacity’ of sites located within the existing built areas.
- 4.56 Paragraph 3.1 requires *that “in order to achieve sustainable housing growth on those sites that are available, deliverable and developable, housing should be fully optimised to ensure that the Borough responds positively to the requirement to provide as a minimum for its objectively assessed needs for housing and other development. Ultimately, this is likely to result in developing some sites at higher densities and could involve taller buildings than those we would have been permitted under our existing planning policies.”*
- 4.57 Paragraph 3.2 calls on the Planning Committee to *“attribute weight to the wider national and local material planning considerations when assessing residential development schemes against current local adopted policy. This will ensure that sound and balanced decisions on planning applications are reached and that future development in the Borough positively contributes to achieving sustainable growth.”*
- 4.58 Paragraph 3.3 enables the Planning Committee to attribute greater weight towards the need to deliver new additional homes In order to reach balanced decisions. It is considered that in light of the current housing delivery test position, the weight ascribed to Policies DM11 and DM13 should be reduced accordingly.

- 4.59 It is apparent from the results of the Housing Delivery Test 2020, which measures housing delivery from 2018 to 2020 that *'Making the Efficient Use of Land Optimising Housing Delivery 2018'* has not been successful in boosting housing delivery, with only 34% of the required housing needs being delivered.

Conservation Area Appraisals

- 4.60 The Chalk Lane Conservation Area and the Woodcote Conservation Area fall to the southeast and northeast of the Epsom Hospital Site.
- 4.61 The Chalk Lane Conservation Area Appraisal states that *"In future, in order that the special architectural and historic interest of the conservation area is protected, the Borough Council will need to be especially vigilant when considering applications for new development. Careful control of traffic and on-street car parking is also necessary, again to preserve the special qualities of the conservation area."*
- 4.62 The Woodcote Conservation Area Appraisal states that *"In future, in order that the special architectural and historic interest of the conservation area is protected, the Borough Council will need to be especially vigilant when considering applications for new development."*

Epsom and Ewell Local Plan Annual Monitoring Report and Housing Delivery Plan

- 4.63 The Council's latest Annual Monitoring Report (AMR) covers the period 2019/2020. It is noted that the Council could not demonstrate a 5-year supply of housing land, but only a 0.98 to 1.0 year supply. In Epsom and Ewell, only 195 new dwellings units were completed in the 2019/2020 period.
- 4.64 The Housing Delivery Test measures the housing delivery from the previous three years. The Council prepared a Housing Delivery Plan, required as a result of the housing delivery test outcomes which were published in February 2019.
- 4.65 The Housing Delivery Plan states that the traditional response to disproportionately focusing on the production of family homes may no longer be an appropriate strategy.
- 4.66 The Housing Delivery plan confirms that land is in limited supply, and therefore all development sites will need to be optimised where appropriate, this approach is in accordance with National Policy on achieving sustainable development.
- 4.67 The Housing Delivery Test reflects that Epsom and Ewell Borough Council have delivered 34% of the required 1519 homes (512 homes delivered) over the period 2017-2020.

SHMA Update Epsom and Ewell Borough Council (September 2019)

4.68 The Updated SHMA responds to changes to the NPPF and NPPG including the requirement that LPA's plan for accommodation for older people and for total housing need to be broken down by age group, type of household, size of household, tenure, and any special requirements. It should be noted that the objectively assessed need for housing set out in the SHMA is not consistent with the government's current position on housing need, as determined by the Standard Methodology. Accordingly, the housing need figures as well as the proportion for specialist older people's accommodation should be adjusted to reflect the Standard Methodology.

4.69 The SHMA states that

- The number of those aged 65 or over in Epsom and Ewell is projected to increase by 4,500 to be 19,500 by 2035. This represents a 30% increase on 2020 figures.
- The rate of increase of the 75 or over and 85 or over groups in the population is projected to be higher, at 38% (2,700 increase) and 33% (700 increase) respectively.
- There is projected to be a 28% increase in the number of households containing those aged 65 or over, and significantly higher rates for older seniors (38% for 75+, 67% for 85+).
- By 2030 22% of the Epsom population will be aged 65 and older, and increase from 18%
- 82% of single older people and 94% of older couples own their own homes outright, implying there is considerable equity available to meet housing needs.
- Substantial numbers of older people tend to under-occupy housing, implying that if they downsize this would free up more family-sized accommodation in all sectors.
- While demographic modelling shows that there is likely to be an underlying shortage of rented and leasehold sheltered accommodation, at the moment supply and demand are roughly in balance.
- Looking ahead to 2035 there will need to be a 32% increase in rented sheltered and a 35% increase in leased sheltered homes.
- There is a need for an additional 248 units of Extra Care accommodation between 2020 and 2035, 80% of which should be leasehold and 20% rented.
- There will be an increasing proportion of single person older households in the borough as 2035 approaches, with possibly an impact on care requirements.
- 80% of single older households under-occupy housing stock. 96% of two or more person households have a surplus bedrooms and 73% have two or more extra bedrooms. This

indicates that there are a significant proportions of older people under-occupying existing housing stock owner who are able to meet their needs by downsizing.

- 4.70 The SHMA update confirms that there are a range of health issues that impact on the housing needs of older people. Those related to mobility issues and requirements for physically-accessible housing. Nearly a quarter of over 65s found their activities were limited a little, with a further 18% feeling their activities were limited a lot.
- 4.71 The SHMA confirms that there will be a relevant housing response to various health issues. "For those with dementia the authority would want to increase quality of life and reduce high hospital emergency admission rates. For depression, as well as medical interventions, more integrated neighbourhoods and closer community ties can help reduce loneliness. The rate of increase of older people with learning disabilities is a product of people generally living longer, but there are issues around what happens to adults with learning disabilities when their ageing carers die. Preventing heart attacks is primarily a public health issue, but the housing contribution would be more suitable accommodation for those with a history of or vulnerable to the condition." There is are projected increases in health conditions in older people, most notably an increase of 36% in people with mobility difficulties and a 40% increase in people with dementia.
- 4.72 The SHMA update confirms that Estimating supply is not a very precise science, particularly because of the move away from standard 'sheltered' schemes to more flexible and integrated housing and support options, as well as the development of Extra Care schemes that blur the boundaries between housing and care-based accommodation.
- 4.73 The SHMA update indicates a present undersupply of extra care accommodation in the Epsom Area, with the current supply set out below.

Table 5.3 Supply of specialist older persons housing

Type	Number
Sheltered – social rented	276
Sheltered / retirement - leasehold	726
Extra Care – social rented	24
Extra Care - leasehold	26
TOTAL	1052

Source: EAC database and Surrey CC

Table 5.3a Demand for specialist older persons housing – demographic model

	Demand per 1,000 75+ population	2020	2025	2030	2035
Sheltered to rent	60	432	504	546	594
Leasehold sheltered	120	864	1008	1092	1188
Enhanced sheltered (50:50 rent and sale)	20	144	168	182	198
Extra care	25	180	210	228	248

Source: ONS 2016 base population projections and SHOP prevalence estimator

5 The Development Proposal

- 5.1 The updated proposals seeks to deliver a comprehensive and high-quality redevelopment scheme that has addressed the reasons for refusal of application ref: 19/01722/FUL. The proposal would positively contribute to the Council's spatial vision and the land use objectives for the Epsom area.

The Care Community Concept

- 5.2 The new care community is designed to respond to the varying dependency levels of older people who need care and to provide housing choice in meeting these needs. Further details of the operation matters, occupancy requirements, accommodation types and care provision are set out in the Operator Statement, which accompanies this application.
- 5.3 The proposed care residences offer a lifestyle alternative for independently minded older people who are seeking "care security". They provide self-contained accommodation that encourages future residents to maintain independence, whilst at the same time offering them a range of care and support services through on-site domiciliary care. The design and operational principles for the proposed accommodation are outlined in detail hereunder.
- 5.4 The proposed care residences and care suites will offer accommodation for residents with more specialist needs including residential and nursing care.
- 5.5 Varying terms have been used to describe integrated living and care. These include extra care housing, very sheltered accommodation, care plus, close care, assisted living, flexi-care and retirement villages/communities. Whilst most publications use the term 'extra care' or 'assisted living', Guild Living and Legal & General prefer the terminology of a Care Community, containing individual Care Residences. However, for the purposes of this planning submission these terms, and those of extra care and assisted living, can be used inter-changeably.
- 5.6 There are many published definitions of extra care, including that set out in the RTPI Good Practice Note 8: Extra Care Housing which defines extra care as *'Purpose-built accommodation in which varying amounts of care and support can be offered and where some services are shared.'*
- 5.7 National Planning Guidance defines Extra care housing or housing-with-care as *"usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also*

available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

- 5.8 The proposed accommodation provides greater scope and option to traditional 'residential and nursing care' or 'sheltered' accommodation and provides an opportunity for older people to live independently in self-contained accommodation.
- 5.9 In more detail, a care community provides a home for life and enables people to age in place –the residence should be designed to accommodate people who become very frail, and the aim is that personal care can be provided at very high levels of need and dependency. At the same time, living in self-contained accommodation helps to generate the attitude of independence that is a major aim and benefit of community living accommodation. The goal is to avoid the dependency or institutionalisation that can arise when there is always someone available to do tasks for an older person. The principle behind providing care in a care community is that people should be helped only in those tasks that they cannot perform for themselves.

Guild Living – The Accommodation Mix

- 5.10 Guild Living will provide a broad range of residences at values that will be accessible to a large part of Bath's older people's housing needs. The type of housing will be diverse and will include;
- Up to 267 Guild Living Residences, including 1, 2 and 3 bedroom apartments for both Sale and Rent.
 - Up to 38 Guild Care Residences and Suites.
 - 24 Key Worker Accommodation.

Guild Living Residences

- 5.11 The scheme proposes up to 267 Guild Living Residences, providing extra care accommodation falling under Use Class C2. The Residences offer a lifestyle alternative for independently minded older people who are seeking "care security". These older people, older than 65, but typically over the age of 75 years, are seeking to downsize to their own self-contained apartment, whilst having a wide range of hospitality-type services and access to a 24/7 on-site professional care and support team and activation programmes.

- 5.12 The residences are supplemented by a broad range of social and leisure facilities within the development, including a restaurant, licensed bar, lounge area, cinema, hydrotherapy pool, gym, children's nursery and wellness centre.
- 5.13 Members will sign up to a minimum level of care and support and the residences will offer a continuum of care and a sense of security. Care will be provided through a domiciliary care provider, registered with the Care Quality Commission. More details are set out in the Operator Statement which accompanies this application.
- 5.14 Each of the residences vary in layout and size (including 1-bedroom, 2-bedroom and 3-bedroom options) and are finished to a very high standard. They are designed to suit residents requiring care and support by combining elegance and comfort with features that help to maximise independence. The kitchens and bathrooms are designed to be "age-friendly" and are fitted with modern, stylish equipment designed to help make life easier and more rewarding. 90% of the apartments are, M4(2) wheelchair accessible and adaptable with 10% of units being M4(3) wheelchair user dwellings. In addition, every apartment is linked to the village 24-hour call system. Dedicated staff are on hand 24 hours a day and provide meals in the comfort of the residents' own home or in the village restaurant, should these be required by the residents.
- 5.15 The residences are available for rental (tenancy agreement) or to purchase (long term lease). The rental option offers a viable solution for many people who may not otherwise be able to afford to purchase a unit of accommodation.

Guild Care Residences and Suites

- 5.16 The scheme proposes up to 10 Guild Care Residences and up to 28 Guild Care Suites, providing extra care accommodation falling under Use Class C2. The care residences and suites provide a place to live where residents have access to 24-hour nursing, personal and dementia care. Care will be provided by a Domiciliary Care Provider who be registered with the Care Quality Commission and the support provided will be tailored to personalised needs, but in an environment that offers light, space and versatile living.
- 5.17 Care residences are typically 46sqm in size and include a living area and kitchenette. Care suites are typically 26sqm in size and comprise a bedroom area and en-suite.

- 5.18 The care suites might also offer a local step down' service enabling hospital teams to transition patients, in particular from the adjacent Epsom Hospital, into a more homely environment on their pathway to get back home rather than remaining in hospital.

Key Worker Accommodation

- 5.19 The scheme re-provides the previous 24 units of Key Worker Accommodation, previously located within Woodcote Lodge, falling under Use Class C3. These units are to be offered to as modern, purpose-built accommodation for nurses and doctors working for the NHS, it is anticipated that most residents of the Key Worker Accommodation would work at the adjacent Epsom Hospital Site.

Children's Day Nursery

- 5.20 The development will provide a children's nursery of 167 sqm (Use Class E). The nursery will provide a valuable facility to the local community, it is intended that 80% of the nursery capacity will be offered to provide childcare for workers of the adjacent NHS site.
- 5.21 The children's nursery which will bring together older and younger members of the community within the Guild Village, providing intergenerational spaces.

Guild Wellness Club

- 5.22 The Guild Wellness Club will be accessible to all prospective residents as well as to the wider Epsom community. The Guild Wellness Club will provide 24/7 holistic care provision utilizing a range of cognitive programmes and activities including; attention, memory, perceptual skills, language, spatial processing, logical reasoning and mathematical processing.

Communal Facilities

- 5.23 The care community will include a range of integrated communal areas and shared facilities which will be designed in accordance with aging and dementia design principles and which will also be opened up to the local public. These facilities include:
- Reception and concierge – All residents and visitors will access the care community through this point.
 - Reading room and café - the reading room and café is for the use of residents and their guests. This will provide opportunities for social interaction and an interface with the local community.
 - Gallery – this will provide opportunities for social interaction.
 - Consultation rooms – external health consultants and practitioners can utilise these rooms and provide medical advice to residents on-site.

- Wellness Centre – as noted above, provision of physical and cognitive stimulation classes for use by residents and elderly public.
- Shop
- Cinema
- Library / craft room
- Dining room
- Hydrotherapy pool
- Gym

Public Accessibility and Community Infrastructure

5.24 Guild Living schemes are designed to encourage interaction and engagement with the broader local community. A large, high-quality public plaza will play an important role in the “socialisation” of residents. This space will be fronted with hospitality uses (including the café, restaurant, nursery and office uses) to encourage engagement with the community, thereby bringing together older and younger members of the community within the Guild Village. Opportunities will also be taken to explore the opportunity for older people from the surrounding community as well as the Epsom Hospital to visit the site to interact with residents and to utilise the communal and wellbeing facilities.

The Benefits of Living in a Care Community

- 5.25 In summary, the key benefits of living in a care community are recognized as follows:
- Delivering care at a lower cost than in retirement homes – such that care can be provided as required rather than a set amount.
 - Allowing the intensity of care to be adjusted; there is flexibility so that the level of care changes as individual or household needs change. Individuals or couples can age in place in their purpose build care apartments which can accommodate a wide range of changing health needs, including end of life care.
 - Ensuring that older people can live independently but as part of a community with a range of care and support facilities.
 - Allowing couples to remain together.
 - Reducing hospital visits and dependency on the National Health Service (NHS).
 - Creating freedom to stay in the local area close to familiar facilities, family and friends.

Guild Living Operational and Design Principles

5.26 The operation and design of the proposed care community will incorporate the following:

- The community will accommodate persons who are aged 65 years and older.
- The community will include a range of nursing, personal and domestic care services. These services will be available 24 hours a day. Nursing and care to the Guild Living residences will be provided and coordinated by a Care Quality Commission registered provider. Additional services including management, security and emergency support, activities organiser, meals and transportation coordination and valet services will also be available on site. For the care suites, there will be 24 hour nursing care on-site.
- The residences and care suites will accommodate residents with varying needs including low dependency (2.5 hours of care per week), medium dependency (between 2.5 and 15 hours of care per week) and high dependency (over 15 hours of care per week). The level of care will increase as the scheme matures. All residents will receive a minimum of 2.5 hours care per week.
- Residents will be subject to an initial needs assessment to determine their required level of care. This initial needs assessment will determine the level of care that is required to cater for each individuals/households specific needs.
- The community will comprise a range of communal areas and shared facilities which will be designed following ageing and dementia design principles. These facilities are outlined above.
- Several of the communal areas and shared facilities can be used to hold social events and activities including the reading room and cafe, gallery, cinema, dining room, healthcare workshop and health care studio. The community will offer the service of an activities organiser who will coordinate active and social programs, as well as lifestyle events.
- There will be an opportunity for residents from the surrounding community to visit the site, interact with residents and to utilise the communal areas and wellbeing facilities. The reading room/cafe located on the ground floor would provide an opportunity for residents to meet and interact with family members, friends and people from the local community. It is also intended that the facilities within the Wellness Club can provide a base for community services, including various support services for older people as well as a potential reablement service to hospital patients and outpatients.
- The community will be designed to dementia design principles as well as lifetime homes standards, 90% of the development will accord with building regulations, M4(2) and 10%

M4(3). The building has been designed to provide a safe and enabling environment for future residents and the individual residences will be designed to cater for the individuals changing care requirements allowing them to age in place.

- The building allows for smart and assistive (predictive and monitory) technology to be installed where required.

5.27 Service and staff facilities will also be provided within the extra care facility including:

- Nurses stations
- Kitchen and associated storage areas
- Staff offices
- Staff changing/WC facilities
- Storage and plant area
- Sluice rooms
- Cold storage
- Medical storage

5.28 Residents of the Care Community will be required to pay a monthly members fee, which will be charged monthly or annually. The Monthly members Fee contributes to:

- Access to and use of communal and wellbeing facilities;
- Ongoing maintenance and of all communal areas;
- General management, security and emergency service and concierge services;
- Facilitation of in-house events and activities;
- Transportation coordination and valet services.

5.29 Guild Living will offer the following key services to residents:

- Nursing and personal care available 24 hours a day, 7 days a week – the level of nursing and personal care provided to each individual/household will be considered on a needs basis and will be flexible as resident's needs change over time.
- Nursing care – promotion of health and prevention of illness.
- Personal care – physical assistance given to a person in connection with eating and drinking, toileting, washing or bathing, dressing, oral care and the care of skin.
- Access to allied health services – GP, Physiotherapy, Audiology, Occupational Therapy, podiatry Exercise physiology and rehabilitation etc.

- Nutrition planning and meal preparation.
- Property and garden maintenance.
- Access to additional events and activities held within the campus or coordinated group trips.
- Domestic services.
- Access to communal and wellbeing facilities.
- Management, security and emergency support.
- Activities organiser – a member of staff will coordinate activities for residents and will encourage engagement with elderly people in the surrounding area.
- Access to meals and dining environments - provided within the Guild community restaurants or café with package options and room delivery services available. Light refreshments will also be offered within the reading room / cafe.
- Transportation coordination and valet services – residents will be able to request transportation as required and resident's vehicles will be collected and parked by staff members.

Design and Place Making

5.30 The site's strategic location, within the settlement area of Epsom and on a large previously developed site presents a significant opportunity to deliver a high quality scheme which will contribute to the delivery of housing in the borough and can promote the Council's land use objectives. The design of the proposed later living community is informed by the guidance set out in the Development Plan documents, the details of which are set out in the section 4 of this Statement. The design of the proposal has been updated to respond to the Planning Committee's reasons for refusal of the previous planning application under reference 19/01722/FUL.

5.31 The overall design approach taken in the application is to achieve a balance between the efficient and effective use of land and protecting local amenity, character and townscape. A key consideration which has informed the design and the amount of development is the need for extra care accommodation in the borough and the benefit of re-providing the Key Worker Accommodation. The severely constrained supply of housing land in the borough and the slow pace of housing delivery has highlighted the importance of optimising the development of the site due to the significant benefits which flow from the delivery of housing.

5.32 Within this context the broad design principles are as follows:

- Replacing the existing hospital buildings with a new high-quality and distinctive built form.

- Creating attractive and accessible pedestrian links through the site – thereby enhancing permeability and forming a link through the site between the Hospital campus to the north and the Millennium Green to the south.
- Providing an enhanced frontage to Woodcote Green Road
- Positioning the bulk of car parking within the building where this is concealed from public views as far as possible.
- Enhancing the existing tree planting and landscaping within the site and particularly along site boundaries.
- Creating a locally distinctive design, which responds positively to the local character of the area and provides an interface between the Millennium Green, the residential area and the Hospital Campus.
- Introducing the tallest buildings in the less sensitive rear part of the site and reducing heights to the south of the site along the main street frontage and adjacent to the residential interface.
- Stepping the building height, increasing from the street frontage to the rear.
- Ensuring that the public landscaped areas are free from traffic.
- Orientating units and windows in order to protect neighbouring amenity and to avoid overlooking.
- Siting buildings within generous areas of public realm and landscaping. These spaces provide valuable public realm and provide spacious areas around the proposed buildings.
- Including a palette of materials which responds to the local materials and vernacular and acknowledges the site's location within Epsom.
- Creating generous roof garden areas, which provide environmental benefits as well as additional amenity spaces for residents.

Updates to the proposed development

5.33 In consideration of the Planning Committee's reasons for the refusal of the previous application a number of key changes have been made to the application. Overall, the updated scheme is considered to address the reasons for refusal of application 19/01722/FUL. These changes are set out below.

Height

- 5.34 The height of the taller / rear elements of the east and west blocks have been reduced by 6m height, achieving the equivalent to a two storey reduction in the height building and reducing the height of the building to lower than that of the adjacent main hospital building (The Wells Building).
- 5.35 The height of the frontage element of the western building has been reduced by around 5 metres by removing a storey off the part of the building closest to Woodcote Green Road and by reducing the building composition. The lower elements of the west building, from two to four storeys have been reduced in height, by around 1.7 metres, through compressing the makeup of the building.
- 5.36 The frontage element of the eastern building has been reduced by some 1.7 m in height by optimising the building composition, including reduced floor to ceiling heights, creating efficiencies in slab heights and service runs and modifying the ground levels.
- 5.37 In overall terms the proposed buildings now sit significantly lower on the site and the height differential between the adjacent buildings has been reduced. The taller elements of the proposed buildings are now lower than the hospital buildings and the height along Woodcote Green Road and the adjacent dwellings along Woodcote Green Road has been reduced.

Setbacks

- 5.38 The setbacks of the proposed buildings have been increased significantly from Woodcote Green Road, and the proposed buildings align with the setbacks of the adjacent buildings and more closely reflect that of the previous built form on the site.
- 5.39 The increase setbacks and alignment with the prevailing street frontages serves to ensure a harmonious streetscape with more regular setbacks, which enables the scheme to relate positively to the existing streetscape and townscape character.
- 5.40 The increased setbacks allow for enhanced landscaping to the front of the site, and the creation of an additional area of public realm, which relates positively to the Millennium Green to the south.

Landscaping

- 5.41 The amended scheme has provided additional landscaping throughout, but in particular along the western boundary of the site and along the street frontage.
- 5.42 The increased street setback has allowed for additional planting, including larger trees, with provides enhanced public realm, street planting and ecological and environmental benefits.

- 5.43 The buildings in the southwest corner of the site, have increased setbacks of 16m from the street edge. This provides an additional area of landscaping and has allowed some parking to be moved from the western edge of the site to a less sensitive position adjacent to Woodcote Green Road.
- 5.44 Along Woodcote Green Road, the area of landscaping ranges from 9.3m to 16 m in depth. This area provides an accessible path along a mature tree boulevard, seating areas, and private terraces.

Neighbouring Amenity

- 5.45 The orientation and placement of the west facing windows of the proposed apartments adjacent to numbers 40 and 46 Woodcote Green Road have been adjusted to avoid overlooking and privacy impacts. The windows to these units are either oriented towards the north and south or are high level windows to avoid direct overlooking to the west.
- 5.46 An enhanced new landscape buffer is being provided along the western boundary of the site, adjacent to the neighbouring residential properties. The landscape buffer provides significant additional planting to that which exists on the site, and forms a new continuous landscaped edge including soft planting, and 9 additional trees.
- 5.47 The car parking spaces along this boundary have been relocated, to a less sensitive position adjacent to Woodcote Green Road, both reducing the potential effects of car movements, but also making space for the landscape buffer zone.
- 5.48 The sensory garden at the podium level of the western building has been amended to reduce potential for overlooking, a balustrade with hedging has been set back 1.5m from the edge of the building and planting borders are incorporated onto the area.

Design and Materials

- 5.49 In addition to the design changes in respect of height, massing, scale, setbacks and landscaping, the overall design and appearance of the scheme has been altered to reduce the amount of metal cladding and the proposed material palette has been updated to reflect more closely local materials and colour tones.

The effects of the proposed amended scheme

- 5.50 The changes made to the scheme which reduce the height, mass and scale, provide additional landscape as well as the changes to the design and materials are considered to address the reasons for the refusal of the previous application.

- 5.51 Overall, the resulting scheme is considered to respond successfully to the scale and character of area. The proposed development is considered to protect and enhance the character of the local environment having regard to landscape and residential amenity considerations.

6 Planning Considerations

- 6.1 The following section reviews the scheme against the Development Plan policies relevant to the proposal. The applicable policies are to be considered within the context of the Council's housing supply and delivery situation which engages the 'tilted balance' in favour of granting permission. As will be set out below there are no material adverse impacts which significantly and demonstrably outweigh the benefits and accordingly, Paragraph 11(d) of the NPPF clearly directs the Council to grant planning permission for the application.
- 6.2 It is our view that the proposal constitutes sustainable development and will facilitate the redevelopment of a well located, brownfield site with a new and diverse use which addresses local housing needs and which fulfils the social, economic and environmental strands to sustainable development as set out in the NPPF and the local development plan. The facility will be the first redevelopment project of this scale and diversity in Epsom aimed specifically at the local older persons care market which will facilitate housing choice and social interaction through the integration of publicly accessibly open spaces and community facilities.

The Principle of the Proposed Development

- 6.3 The proposed development would make effective and efficient use of previously developed land within the defined development boundaries and would accord with Policy CS1 of the Core Strategy.
- The site is situated in a sustainable location, within 1 km of the town centre and with good public transport links.
 - The site includes various ecological enhancements, through the additional landscaping areas and biodiversity enhancements.
 - The proposal will provide positive social improvements through the creation of an intergenerational space, accessible to the broader public and providing an exemplar living environment for older persons.
- 6.4 The development is considered to be consistent with the approach set out in the policy statement *'Making Efficient Use of Land - Optimising Housing Delivery'* as it represents the effective use of the site and optimises the capacity of the site. Moreover, it is considered that the lack of five-year housing land supply and the underperformance in terms of the housing delivery test add further significance to the benefits that the scheme will bring in terms of housing delivery and the effective use of land.

the aforementioned policy statement makes it clear that policies DM11 and DM13 are to be afforded significantly reduced weight in deference to the benefits of delivering housing on previously developed land. Accordingly it is clear that the housing benefits, considered within the context of the tilted balance are to be ascribed significantly greater weight than the constraining aspects of Policies DM11 and DM13.

- 6.5 Core Strategy Policy CS7 requires the Borough to make sufficient provision for housing. In the support text of Policy CS7 it is confirmed that new housing development in Epsom and Ewell will be focused in locations that perform best in sustainability terms. Core Strategy Policy CS8 sets out the new housing will be located within the defined built up area of Epsom and Ewell, with the emphasis on the re-use of suitable previously developed land.
- 6.6 The Housing Delivery Plan states that the traditional response to disproportionately focusing on the production of family homes may no longer be an appropriate strategy. In this regard it is recognised that retirement accommodation can benefit the wider housing system by freeing up other forms of housing in the marketplace and by removing some competition for houses, in particular competition for smaller homes, which are suited both to people wishing to downsize due to age and first time buyers.
- 6.7 The Housing Delivery plan confirms that land is in limited supply, and therefore all development sites will need to be optimised where appropriate, in accordance with National Policy on achieving sustainable development.
- 6.8 Paragraph 11(d) of the NPPF is engaged due to the lack of five-year housing land supply and the housing delivery test result, accordingly the presumption in favour of sustainable development is engaged, which means that the Council is to grant permission, unless the scheme gives rise to adverse impacts which would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole. As will be set out below there are no material adverse impacts arising from the scheme, which are considered to significantly and demonstrably outweigh the benefits of the scheme, accordingly, it is our considered opinion that the Council is required to grant planning permission for the application.
- 6.9 The principle of the development of the site is thus considered to be in accordance with the above-mentioned planning policies as well as the presumption in favour of sustainable development as set out in paragraph 10 of the NPPF as well as paragraph 118 of the NPPF which ascribes “*substantial weight*” on the value of using suitable brownfield land within settlements.

6.10 The principle of development was considered acceptable under application 19/01722/FUL.

The Loss of the Existing Hospital Use

6.11 The previous use of the site as part of the wider Epsom General hospital has now ceased, as has the key worker accommodation provided in Woodcote Lodge. Notwithstanding, the use of the site remains extant and is accordingly be considered to be a community facility, the loss of which is to be considered in respect of Policy CS13. This states that the loss of community facilities will be resisted unless:

- it can be demonstrated that there is no longer a need for such a facility in either its current use, or in any other form of community use; or
- there is an appropriate alternative means of providing an equivalent facility.

6.12 In the case of the subject site, and having regard to the first of the policy criteria, the land is no longer occupied or used by the hospital, save for parking purposes (under license), following being declared surplus to requirements by the NHS. The NHS have provided public confirmation of this as set out in the press release provided at Appendix 2. This is regarded as direct evidence that there is no longer a need to retain the land for hospital use.

6.13 The site was identified by the NHS for sale on the basis that the site contained the derelict accommodation, surplus to the current and future needs of the NHS. The sale of the surplus land leaves enough space to build a brand new acute facility on the Epsom site as well as additional car parking, an application for which is currently pending.

6.14 At the same time, the sale of the land will enable wider improvements to the existing hospital. These improvements, which comprises direct community benefits, some of which may already have been achieved, are as follows:

- A new 30 room outpatient facility in Woodcote Wing
- Replacing all the windows in Bradbury and Denbies Wing
- A new outpatient therapy centre in Langley Wing (now open)
- Replacing the air handling plant in Wells Wing to reduce summer temperatures
- Refurbishing some of the lifts at Epsom Hospital
- A new clinical administration building
- Replacing the old steam boilers with a combined heat and power plant
- Replacing all the lighting in the hospital with modern energy efficient LEDs

- A new decked car park
 - A link bridge from Wells Wing to Langley Wing as part of the redevelopment of Langley Wing that we have secured separate funding for
 - Expansion to our Emergency Department and Urgent Treatment Centre providing increased assessment and treatment cubicles
 - External refurbishment of Wells Wing including roof replacement and replacement of window
- The existing provision of parking on the site is to be replaced within a new parking facility on the Epsom Hospital Site.

6.15 At the same time the proposed development will provide a number of facilities which are open to the public, which is encouraged in terms of CS13.

6.16 The wider community benefits, as well as the benefits of providing a facility for older people, are set out below, present several factors which, taken together, are considered to provide a compelling land use in favour of the application and which contribute to the various strands of sustainable development set out in the NPPF.

The Merits of the Proposed Replacement Use

Addressing a Need for Specialist Older Persons Accommodation

6.17 The proposal will address a pressing local need for specialist older person's accommodation. Development Management Policy DM21 states that planning permission will be granted for specialist form of residential accommodation, subject to the following requirements being met:

- That the application documentation includes clear and robust evidence that demonstrates that there is a need for the new accommodation; and
- The delivery of the new accommodation does not result in an over-provision of that particular type of accommodation; and
- The design of the proposal is demonstrated as being sufficiently flexible to readily accommodate conversion to other appropriate uses, either residential or non-residential, in the event that the need for the permitted use declines.

6.18 Paragraph 4.4 of the supporting text to Policy DM21 states that:

"Our evidence tells us that there are a number of very specific housing needs that reflect the mix of different people and communities that want to live in our Borough. For example, as

people get older and potentially less mobile their housing needs will change. Some of their accommodation needs could be met through the adaption of their existing homes but equally it may result in elderly residents seeking to downsize and possibly seek accommodation that has a warden or on-site care support."

6.19 In respect of the first two criteria set out in Policy DM21, there is a clear shortage of supply and a significant demand for future care accommodation (both now and in the future).

6.20 At a national level, the older UK population is set to grow dramatically over the coming years, with the increasing divide between supply and demand reported to result in the next crisis in the housing market.

6.21 The challenges of delivering sufficient amounts of new housing, particularly purpose-built accommodation for older people, across the United Kingdom (UK) is well documented in reports such as:

- Housing our Ageing Population: Plan for Implementation (published November 2012), prepared by an All Party Parliamentary Group on Housing and Care for Older People;
- The Top of the Ladder, prepared by Demos (published 2013);
- Housing Our Ageing Population: Panel for Innovation (HAPPI), prepared by a Cross Party Panel for Communities and Local Government, the Department of Health and the Homes and Communities Agency (published 2009).

6.22 These reports find that there is a chronic undersupply of fit for purpose housing for older people in the UK. Despite the over 60 population making up approximately 22% of the UK's overall population, retirement properties in the UK make up just 2% of the UK's housing stock. The demand for accommodation for older people housing is only set to increase as the elderly population increases at a notable rate:

- The population aged 85 and over is projected to double from 1.7 million in 2018 to 3.4 million in 2030.
- To 2038, the 65-69 age group is projected to grow by 15%, the 70-74 age group 44%, the 75-79 age group by 63%, the 85-89 age group by 89%, the 90-94 age group by 162% and the 95- 99 age group by 216%.

6.23 The 'Top of the Ladder' report considers that the increasing divide between demand and supply will result in the next housing crisis. This report acknowledges that the Government cannot face this

challenge alone and sets out that private development will play a large role in easing this housing crisis. The report addresses the need for the planning system to do more to facilitate older people's accommodation suggesting incentives and concessions in relation to land allocations, section 106 contributions and CIL charges.

6.24 HAPPI was commissioned by the Homes and Communities Agency, on behalf of the Department for Communities and Local Government (DCLG) and the Department of Health (DoH), to consider how best to address the challenge of providing homes that meet the needs and aspirations of the older people of the future. Four main principles are established in the HAPPI report:

- A national effort is required to meet the needs and aspirations of elderly people;
- Better choice for elderly people must be created through a greater range of housing opportunities;
- Older people's housing should meet higher design standards for space and quality;
- Local Planning Authorities should play a key role in ensuring that housing is provided in line with local needs and demands

6.25 The need for elderly person's accommodation is projected to increase at the local level and Guild Living's assessment of demand and supply analysis points to an acute shortage of the kind of provision required by many local residents.

6.26 The Strategic Housing Market Assessment for Kingston upon Thames and North East Surrey (2016) confirms the need at the local level and reports that there is an annual requirement for an additional 235 apartments of sheltered / extra care apartments up to 2035. It should be noted that the figures set out in the SHMA are considered to be out-of-date by virtue of the Government's more recent housing need figures confirmed through the Standard Methodology. Notwithstanding the out-of-date figures, the conclusions of the SHMA in addressing the needs of Older People remain broadly relevant insofar as they highlight the pressing need for specialist older people's accommodation, as follows:

- As a proportion of the overall population, the percentage of those aged 65 or over is forecast to increase by 4-7 percentage points by 2037 across the HMA. This represents a 75% increase on current numbers of households with older people in them.
- There are forecast to be 28,000 people aged over 85 in the HMA, an increase of 133% on current numbers.

- 70% of single older people and 84% of older couples own their own homes outright, implying there is considerable equity available to meet housing needs. However, 26% of single older people and 9% of older couples are in the social or private rented sectors and will not have these assets.
- Older people tend to under-occupy housing, implying that if they downsize this would free up more family-sized accommodation in all sectors.
- Across the HMA there is a surplus of sheltered accommodation (particularly in the social sector), but a deficit of enhanced sheltered and extra care. To ensure future demand is met, 235 additional units per annum of all types of specialist accommodation will be required until 2035.
- In terms of tenure, across all types of specialist accommodation, an increase in the proportion of leasehold or owned accommodation is forecast. However, despite the relative affluence of older people in the HMA, it will be important to ensure that developments remain within reach of those on lower incomes, or with less equity.

6.27 The Epsom and Ewell Strategic Housing Market Assessment Update 2019, which provided an update on the data which formed the basis for the 2016 SHMA and included more detailed analysis on the housing requirements for specific groups. The conclusions of the EEBC SHMA in addressing the housing requirements of Older People are as follows:

- By 2035 the number of those aged 65 or over in Epsom and Ewell is projected to increase by 30% to 19,500 and the increase for the over 75 and over 85 groups is projected at a greater 38% and 33% respectively.
- There is projected to be a 28% increase in the number of households containing those aged 65 or over, a 38% increase for 75+, and an increase of 67% for 85+
- 94% of older couples and 82% of single older people own their own homes outright, indicating considerable equity available to meet housing needs.
- There is a need for an additional 248 units of Extra Care accommodation between 2020 and 2035, 80% of which should be leasehold and 20% rented.

6.28 In substantiating the level of local need, Guild Living have instructed Carterwood, market-leading analysts in the care sector, to assess the level of demand and supply in the local area. The Care Need Assessment, which accompanies this planning application, 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.

- 6.29 The need for Extra Care Accommodation is set out in the Carterwood assessment for a 3 and 5 mile catchments area around the site.
- 6.30 In conjunction with discussions with Surrey County Council's adult social care services, a catchment area of three miles from the site was deemed to be most appropriate, in order to accurately account for the local geographic need for later living accommodation. The analysis shows there to be a significant existing unmet need (at 2024 when the scheme will be operative) for 463 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 1,059 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.
- 6.31 The assessment shows that this need will rise to 530 and 1,245 private extra care units within the 3 mile and 5 mile catchments respectively by 2031, and will increase further to 675 and 1,668 by 2041. Based on the projected population growth, which is particularly pronounced in the older age categories, the need for private extra care units will therefore continue to grow and create a sustained level of unmet need in the respective catchment areas.
- 6.32 In addition to the demonstrated quantitative need, there are also significant qualitative need arising as a result of the various benefits which a scheme of this nature would bring.
- 6.33 In response to the second criteria outlined in Policy DM21 the scheme will not result in any over-provision of care accommodation in the locality, indeed the Carterwood report and the Council's 2019 SHMA both point to very limited existing and pipeline supply of comparable accommodation.
- 6.34 The proposed care community on the Epsom Hospital site will be the first of its kind in Epsom and will be an exemplar in terms of the standard of facilities and in the provision of support and care. The site is in a highly sustainable location, with good access to public transport, and satisfies the locational and design objectives set out in the Core Strategy and Development Management Policies (in particular Policy DM21 which supports specialist forms of residential accommodation and Policy DM22 which requires an appropriate mix of housing within the Borough.

- 6.35 The proposal for the subject site is compatible with existing uses, including the adjoining hospital, and there is no existing concentration of provision in the locality, thereby ensuring that the scheme will support the creation of a mixed, inclusive and sustainable community.
- 6.36 The Council's Annual Monitoring Report confirms that the C2 accommodation will contribute towards the provision of residential units required across Epsom as a whole. In this regard, making use of the methodology employed by the Housing Delivery Test Measurement Rule Book and set out in the Annual Monitoring Report, the scheme will contribute a total of 292 units towards housing delivery in the Borough.
- 6.37 The site accordingly delivers a range of accommodation types to meet the need in the local area, and will contribute to the delivery of homes in the area, which are considered to be matters which carry significant weight in the consideration of the application.

Improving wellbeing and social interaction and health benefits

- 6.38 Having regard to Policy DM21, the later living community is considered to represent an exemplar in terms of the standard of facilities and in the provision of support and care. Guild Living are at the forefront of research in developing the world's best practice "in ageing" and in tackling loneliness and are to establish a Guild Foundation led by Emeritus Professor of Gerontology at Bath University, Malcolm Johnson, who is tasked with establishing relationships with leading Universities.
- 6.39 The proposed accommodation on the Epsom Hospital site will be fully designed with the needs of both active older people as well as frailer older people in mind, and varying levels of care and support will be provided on site. The key design principles focus on issues relating to familiarity, legibility, distinctiveness, accessibility, comfort, safety and individual choice. The scheme will include an extensive range of communal facilities which are to be managed and operated as an integral part of the care concept to encourage social interaction and the proposed care model includes a range of on-site nursing, personal and domestic care services to be available 24 hours a day, 7 days a week as well as access to a full programme of cognitive stimulation activities.
- 6.40 The community will be designed to provide a safe and enabling environment for future residents. The overall layout of the buildings will offer logically laid out space, cores, zones, minimised corridors, wheelchair compliance and security measures. The buildings will also allow for smart and assistive (predictive and monitory) technology to be installed. The individual residences will be designed to

lifetime homes, Building regulations M4(2) / M4(3) and dementia design principles. Importantly, residences will cater for the individuals changing care requirements allowing residents to age in place.

6.41 In light of the above, the proposal will result in a long-term enhancement to the provision of care within the local area and will support housing choice. As set out in ‘Future of an Ageing Population’ prepared by the Government Office for Science (2016) *‘...residents of specialised housing generally show high levels of satisfaction, improved wellbeing, better health outcomes and reduced healthcare costs.’* The NPPG similarly notes that *“Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future. It is better to build accessible housing from the outset rather than have to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their homes.”*

6.42 Importantly the scheme has the potential to reduce the costs to health and social services (including local GP practices) by providing specialist and dedicated in-house care and support and reducing the need for residents (who might have previously lived alone) to call on existing local services. It is estimated that there is a reduction of at least 30% on the demands placed on the local NHS, from the residents living in such a community. The scheme will also incorporate a number of consultant rooms for use by local practitioners, including the local GP surgery and Guild Living intend to create strategic alliances with the local medical services.

6.43 In summary the following well-being benefits are noted:

- Reduced pressure on the NHS by reducing GP visits and ambulance call outs.
- Reduced number of in-home incidents and need for assistance though care provided by on site staff.
- A reduction in hospital discharge delays as hospitals can discharge patients into well designed environments with in-house care.
- Promoting social inclusion, leading to improved physical and mental well-being and in turn reducing pressure on the NHS.
- Reduced incidences of isolation and loneliness, which can mitigate against the onset of depression and dementia.
- Improved quality of life by providing shared facilities.

Promoting Social and Community Cohesion

- 6.44 The site is in a highly sustainable location for the proposed use and satisfies the locational and design objectives set out in the Local Plan. This approach is consistent with the NPPG which states that: *“The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres”*.
- 6.45 The proposal for the subject site is compatible with existing uses in the area and provides an appropriate development, forming an interface between the traditional residential development abutting the site and the hospital campus. There is no existing concentration of comparable provision in the locality, thereby ensuring that the scheme will support the creation of a mixed, inclusive and sustainable community.
- 6.46 Importantly the proposal will help to support the vitality and viability of Epsom town. Currently, the vast majority of Britain’s purpose-built retirement communities are located in suburban areas or the countryside. By contrast, Guild Living are bringing their schemes into urban areas and close to town centres at a time when many high-street retailers are struggling. As well as taking over a redundant hospital site, the proposed care community will create a vibrant community in close proximity to the town centre to support town centre uses.
- 6.47 At the same time, the proposed development will incorporate ancillary facilities at ground floor level (including the restaurant and wellness centre) that will promote activity and engagement including improving the links with the adjoining hospital. Guild Living are committed to integrating these communal and support facilities with the local community and opening them up for use by the local public.
- 6.48 The community also includes a children’s day nursery to serve those working within the scheme as well as the wider area, in addition to the benefits that this offers in promoting inter-generation living.
- 6.49 Collectively, these shared uses and shared spaces can help to foster social cohesion, with interaction being at the heart of the proposed care community. The uses will promote activity within the site throughout the day and evening and will allow different members of the community to positively interact. The two public squares and the connecting spaces play an important role in the “socialisation” of residents and these spaces are fronted with active uses to ensure that the greater community (of all ages) are encouraged to engage with residents. Rather than being a closed or gated community, these spaces will be an activator between the site and the city centre and adjoining

open spaces. The proposed development is thus considered to be in accordance with paragraph 117 of the NPPF and Core Strategy Policy CS7, which calls for development to be focussed on locations that perform best in sustainability terms.

Creating synergies with the hospital and through the provision of step-down services

- 6.50 The proposed care community is entirely compatible with the adjoining hospital use offering the scope for synergies in respect of transitional care, staff training and excellence and the shared use of communal and wellness facilities.
- 6.51 An important benefit of the proposed scheme is the inclusion of a number of care suites. These suites are able to accommodate temporary stays of a few weeks and will help to alleviate hospital bed blocking. Occupants will likely be patients who have been in hospital and could otherwise be discharged but cannot be looked after in their own homes.

Contributing towards the local five-year housing supply and the housing target for Epsom

- 6.52 The proposed accommodation will directly support the Council's housing delivery numbers. National Planning Policy Guidance states that:

"Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data."

- 6.53 The Council's Annual Monitoring Report confirms that C2 units can be counted towards the supply of new homes. The Strategic Housing Market Assessment for Kingston upon Thames and North East Surrey (2016) similarly notes that the extra care requirements for the area form part of the wider objectively assessed housing needs.
- 6.54 Including specialist care accommodation within the overall housing balance is highly appropriate in this case where the proposed development comprise apartments that would be sold on a leasehold basis to co-habiting couples or single people moving away from the 'family' home. As such the

proposal will make a very meaningful contribution to the Council's 5-year housing land supply (noting the significant shortfall as set out in the latest Annual Monitoring Report).

- 6.55 The proposed development provides 305 self-contained units (comprising living and sleeping accommodation as well kitchen and bathroom facilities, each behind its own front door) which would contribute towards the borough's identified housing need.
- 6.56 The 2019 EEBC SHMA update confirms that there is currently a prevalence of housing being under-occupied by older people, the development of 305 new self-contained units, will, as confirmed by the SHMA, free up more family sized accommodation. The Council's Annual Monitoring Report 2017/2018 confirms that that the C2 accommodation will contribute towards the provision of residential units required across Epsom as a whole. In this regard the scheme will contribute 292 units to the supply of housing in the Borough.
- 6.57 The proposed development is thus considered to be consistent with the requirements for housing provision as set out in policy CS7.

Providing Local Employment and Economic Development

- 6.58 The scheme will generate a minimum of 40 FTE jobs upon the initial occupation of the care facility. The range of potential jobs includes management, technical, administrative, care, housekeeping, maintenance, physiotherapy and occupational therapy positions. The number of direct jobs provided by the scheme will increase as the scheme matures and it is anticipated that the total number of staff within the later living scheme is likely to increase to 55 to 60.
- 6.59 It is expected that most staff would be recruited locally, and a site-specific recruitment strategy will be prepared to support this aspiration. Guild Living also propose to engage with the local colleges and the hospital to provide specialist training courses for staff.
- 6.60 Ancillary uses within the scheme will provide other direct employment opportunities including the proposed children's nursery and the Wellness Centre.
- 6.61 In addition, the proposal will create indirect employment opportunities, for example, during construction and through associated facilities and services to support the on-going operation of the facility. Intensifying the use of this underutilised site and increasing the number of people living and working within the scheme, will in turn increase the use of services and facilities in the local community.

Regenerating an Under-Utilised Site

- 6.62 The proposal offers a unique opportunity to regenerate a site which is currently under-utilised and occupied by redundant buildings which are surplus to the needs of the NHS. The development proposal provides an opportunity to remove the poorly maintained buildings, including a number of temporary structures, and to create exemplar buildings which will enhance the local area and which would provide significantly better-quality landscaping and open spaces and improved movement patterns, all of which are considered to further the objectives of re-using suitable previously developed land for housing, as set out in Core Strategy Policies CS8 and CS7, which seek to focus development on previously developed land and sites within the defined built up areas of Epsom and Ewell Borough.
- 6.63 It has been confirmed by the NHS that the site is surplus to their requirements and the development will enable the enhancement of the existing hospital facilities on the remainder of the broader NHS site, in accordance with Policy CS13. In accordance with Policy DM21, the SHMA and the submitted Care Needs Assessment confirms a need for the proposed care community in the area and that the development will not amount to the over-provision of older person's accommodation in the area. The development is furthermore sufficiently flexible to convert to other residential uses, should such need arise in the future.

Design and Visual Impact

Design

- 6.64 Paragraph 124 of the NPPF identifies that the Government attaches great importance to the design of the built environment and that good design is indivisible from good planning.
- 6.65 Chapter 11 of the NPPF is dedicated to making effective use of land. Paragraph 118 states that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.
- 6.66 Core Strategy Policy CS 5 seeks to protect the Borough's heritage assets and the setting of these assets. High quality and inclusive design is required for all development. Development should:
- create attractive, functional and safe public and private environments;
 - reinforce local distinctiveness and complement the attractive characteristics of the Borough;

- make efficient use of land and have regard to the need to develop land in a comprehensive way.
- 6.67 Policy DM 9 seeks enhancement of the townscape through new development. Developments should make a positive contribution to the Borough's visual character and appearance. Policy DM10 calls for development proposals to incorporate principles of good design.
- 6.68 Policy DM 11 supports proposals which make the most efficient use of development sites located within the Borough's existing urban area.
- 6.69 The development has been designed to contribute to the character and distinctiveness of the local area, and to respond sensitively to the local context. The height of the development has balanced the pressing need for housing for older people in the area, and to respond to the local character and reasons of refusal of application 19/01722/FUL.
- 6.70 In response to the surrounding character, the taller elements of the scheme have been located to the rear of the site, adjacent to the hospital, while the lower elements of the scheme have been positioned adjacent to the residential properties to the west of the site and along the Woodcote Green Road street frontage.
- 6.71 The proposed scheme reduces the amount of development which fronts onto Woodcote Green Road, by reducing the height of the proposed building which is in a similar location to Rowan House. The proposed building which is in a similar position to Woodcote Lodge has a much narrower frontage, and while it is approximately one storey higher the amount of building fronting the site is reduced. It is also noted that the space along the western side of the site is increased in width, adjacent to the house at 40 Woodcote Green Road, and the gap between the east and west building is increased a considerable amount over than between the existing Rowan House and Woodcote Lodge.
- 6.72 The scheme is setback from the street frontage, with the west building set back by 16m, and the east building between 5 metres and 10 meters. This provides generous areas of landscaping, to the south west corner of the site and a long landscaped buffer along the edge of Woodcote Green Road. The generous setback to the street frontage and the substantial tree planting and landscaping along Woodcote Road improves the local street-scene, in accordance with Policy DM 5, DM 9 and DM 10.
- 6.73 In accordance with policy CS6, the proposed building incorporates sustainability measures. The principle carbon reduction and energy efficiency in the building arises from a fabric first approach, making use of highly efficient well insulated and airtight buildings. Further energy efficiency

- measures include photovoltaic electricity generation, and an all-electric heating system (in line with government's directives to move away from gas heating).
- 6.74 The development will provide a large area of enhanced public realm and improved pedestrian route to the hospital site to the north. New lighting, a 24 hour presence on site and passive surveillance will promote the principles of safe design.
- 6.75 The new buildings will be fully accessible, with level thresholds, step free access and lift service throughout. Ease of access will be enhanced through concierge services and the Automatic Parking System. 90 % of the units will be constructed to M4(2) standard with the remainder constructed to M4(3) standard. All external areas will be constructed to be fully accessible and suitable to those with mobility impairments.
- 6.76 For further details please refer to the Design and Access Statement which accompanies this application.
- 6.77 Overall, it is considered that the proposed development would provide high quality scheme, which makes efficient use of the site. The proposals accord with Policies CS5, DM9, DM10 and DM11.

Visual and Townscape Impact

- 6.78 Policy DM9 requires that the townscape be enhanced through new development and the Council will consider compatibility with local character, the historic and natural environment, the setting of the site and connection to its surroundings and the inclusion of locally distinctive features and appropriate materials.
- 6.79 An assessment has been undertaken to analyse townscape character areas and views of the site within a 500m radius (the search radius was determined due to the urban location of the site), as well as wider strategic views at a greater distance. Views have been identified which contribute to an aspect of townscape sensitivity or character (including designations, such as a Conservation Area for example) or have a visual amenity. As part of this process 15 visual receptors (views) have been identified and formally agreed with EEBC Planning and Conservation Officers.
- 6.80 The assessment states that site already contains significant built form and there are large-scale hospital buildings located to the immediate north and north-east of the site. The heritage, townscape and visual impact assessment concludes that as result of the mitigation through design now embedding in the proposals, impact on surrounding townscape and visual receptors is

predominantly neutral to negligible with several of the views and townscape areas experiencing no readily discernible change. Other views and townscape areas, which range from low to medium sensitivity, will witness more noticeable, moderate change as a result of additional height and massing. For the most part the townscape impacts fall within the lower assessment range and in our view would not constitute significant effects, which outweigh the housing and other scheme benefits.

- 6.81 During the course of designing the updated development proposals, the designs have evolved in response to the reasons for the refusal of the application set out by the Planning Committee. The east and west block massing has been reduced by some 6 metres in height, equivalent to a two storey reduction in the height of the two taller elements of the building. The reduction in height has been achieved by removing the uppermost level of accommodation, reducing the floor to ceiling heights, optimising slab thickness and service runs and making minor changes to the ground levels.
- 6.82 The taller element of the east block, adjacent to the hospital, has been reduced by 6m (by removing a level of accommodation and gaining efficiencies in the building's structure), the east block then steps down to Woodcote Green Road, where the frontage element of the eastern building has been reduced by 1.7m. In addition to the reduction in height the setback of the building has also been increased, and additional landscaping provided.
- 6.83 The western block has been reduced towards the hospital by 6m (by removing a level of accommodation and gaining efficiencies in the building's structure), the building then steps down to Woodcote Green Road. The building has been reduced by reduced by 2m at the five storey element, and a further floor level has been removed from the frontage element (achieving a further to 5m reduction fronting onto Woodcote Green Road). As per the eastern building, in addition to the reduction in height, the setback of the building from Woodcote Green Road has also been increased and additional landscaping provided.
- 6.84 The existing site buildings and overall condition of the site is of poor quality, comprising a disparate collection of heavily altered buildings and expansive areas of car parking, which lack any coherent masterplan. Buildings within the wider hospital site to the north, are greater in height than the proposed scheme and therefore the proposals represent a reasonable response to existing building heights to the area while seeking to make efficient use of the site.

- 6.85 The impact on surrounding townscape and visual receptors has been found in many cases to be none or negligible, with several of the views and townscape areas experiencing no readily discernible change. Other views and townscape areas, which range from low to medium sensitivity, would witness more noticeable, minor or moderate change as a result of additional height and massing. While the benefits of the previous scheme were acknowledged to clearly outweigh any townscape and heritage impacts, the updated scheme has further improved on the previously identified townscape impacts, it is therefore clear that the proposed updated scheme is acceptable in heritage and townscape terms.
- 6.86 Overall it is considered that the updated proposal complies with Policy DM9 and the amendments to height, setbacks and massing have addressed this reason for refusal from application 19/01722/FULL.

Heritage and Archaeology

- 6.87 Policy DM8 resists the loss of Heritage Assets and requires that any effect on Heritage Assets take the significance of the asset into account. The policy further requires that an Archaeological Desk-Based Assessment be undertaken.
- 6.88 The site does not contain any designated heritage assets, nor does it lie within a heritage-related designated area. The 500m search radius was used to identify heritage assets in the vicinity; this radius was considered sufficient due to the urban location of the site. There are 57 listed buildings/structures, two Conservation Areas and a number of assets identified by Epsom & Ewell Borough Council as locally listed (i.e. considered as non-designated heritage assets for NPPF purposes) within 500m of the site.
- 6.89 The HTVIA confirms that there would be no direct physical impacts on any built heritage assets. Historical research and a field appraisal have been undertaken to verify which heritage assets, out of those initially identified, could be affected by the proposals as a result of changes to their settings, and how this would impact their significance. Due to a lack of intervisibility and a lack of historic functional association, it has been concluded that the significance of the majority of these heritage assets would not be affected as a result of the Proposed Development. Those heritage assets which are considered to potentially be affected by the proposals, either due to their close proximity, intervisibility and/ or shared historic association, and are therefore identified as built heritage receptors, include:

- Chalk Lane Conservation Area;
- Woodcote Conservation Area;
- 4 Grade II* listed buildings; and
- 19 Grade II listed buildings.

6.90 The proposals would have either no impact or a negligible impact on the significance of the majority of the surrounding heritage assets. The exception to this is the Chalk Lane Conservation Area and some of the nearby listed buildings which are likely to experience an adverse impact which we have assessed would be at the low end of the *'less than substantial harm'* spectrum.

6.91 The HTVIA has considered the effect of the development on heritage assets and while concluding that less than substantial harm would result as a consequence of the proposed development, this harm is at the low end of the spectrum. As set out within this planning statement, substantial public benefits would arise from the proposed development, which, in accordance with paragraph 196 of the NPPF, are considered to outweigh any harm to heritage assets.

6.92 The Archaeological Desk Based Assessment concludes that the site is not located within an area of High Archaeological Potential and there are no identified archaeological assets within the site. There is a high potential for post-medieval and modern evidence and a low potential for evidence from the prehistoric to medieval periods, which if present would be of local significance, while prehistoric remains may be of regional significance.

6.93 Due to the potential for the survival of archaeological remains in areas of the site, it is recommended that a programme of archaeological investigation be defined through an agreed written scheme of investigation for an archaeological watching brief.

Landscaping and Trees

6.94 Policy CS3 requires that development detrimental to the borough's biodiversity is minimised or adequate mitigation measures should be provided, where possible development is to contribute positively to biodiversity. Policy DM4 sets out that development affecting any site or building that supports species protected by Law, including their habitats, will only be permitted if appropriate mitigation and compensatory measures are agreed to facilitate the survival of the identified species. Policy DM5 sets out that the Borough's trees, hedgerows and other landscape features will be protected and enhanced.

- 6.95 The proposed scheme results in the significant improvement to the amount and quality of landscaping and tree planting on the site. The updated scheme has further increased the area of landscaping, due to reductions in the building footprint and with the increased setback from Woodcote Green Road.
- 6.96 Along Woodcote Green Road, the amount of tree and vegetation planting, in the updated scheme, has been increased in density along the street edge and the size of trees to be planted increased. This area is further enhanced by a boulevard of trees and seating areas to enliven the streetscape.
- 6.97 The updated scheme has reduced the amount of parking along the western boundary of the site. This area has been reconfigured to allow an increased landscaped buffer along the boundary with the adjacent properties and a denser planting buffer has been incorporated with larger trees, proposed to form a continuous landscaped edge to the site
- 6.98 The landscaping scheme across the site has been updated to include mature tree groves and new areas of public realm. Further, the movement areas within the site have been lined with trees and boundary hedges.
- 6.99 Guild Living have adopted a curvilinear based design which is considered to successfully integrate the landscape and the buildings. Curved paths and features heighten expectation and adventure without creating anxiety, they suit the softer, natural horticultural approach and link with the layouts in Millennium green, drawing people into the site and providing comfort whilst enjoying the amenity.
- 6.100 The central courtyard is a generous space with a strong geometry and spatial hierarchy which encourages multiple uses by all sectors of the community and flexibility to host a number of different events. Key to this is a mix of hard and soft space as well as open and closed areas which creates layered spaces.
- 6.101 Guild Living seek to build upon on the existing natural character of Woodcote Millennium Green as a means of softening the existing hard character of the hospital, the design promotes a soft horticultural, natural character. This creates a sense of place, creating animation through the natural ecology, as well as a living changing dynamic at a speed so as not to confuse or alienate our residents, more engage and encourage them.
- 6.102 The landscape design seeks to protect and enhance ecology through, protecting priority species by:-
- Retaining current trees for visual and ecological benefit.
 - Dead, diseased or damaged trees will be replaced with native species.

- Bird and bat boxes are to be added to existing trees to maintain their populations.
- Mini-beast hotels are to be provided to create habitat for reptiles, amphibians, invertebrates and small mammals.
- Introduce green open space with biodiverse planting to encourage wider species to utilise the site as habitat.
- Provide environmentally rich landscapes in areas of the building that offer natural protection from human interference.
- Providing an ecological corridor between the Woodcote Millennium Green and the ecological area at the western boundary.

6.103 As required in Policy DM5, key areas of existing trees, particularly along the western boundary of the site are to be retained. Only one category A tree is proposed to be removed.

6.104 It is considered that the proposed development would deliver a high quality environment, which provides a soft edge to the scheme and improves the street scene, in accordance with Policy DM5.

Arboricultural Issues

6.105 Policy DM5 requires that the Borough's trees, hedgerows and other landscape features will be protected and enhanced.

6.106 Guild Living have undertaken an Arboricultural Assessment, which includes a tree protection plan and method statement.

6.107 Of a total of 47 trees on the site, it is proposed to remove 29 of the existing site trees, of which 11 are category U trees and 16 are Category C trees, only one Category A tree is to be removed as well as a part of a Category B tree. 18 Site trees are to be retained, of which five are Category A and B trees.

6.108 To compensate for the loss of the site trees, it is proposed to plant more than 100 additional trees on the site, this will result in a significant uplift in the number of trees, along with an associated biodiversity enhancement. Replacement trees are proposed to be medium and large trees.

6.109 Tree protection measures, including ground protection and hoarding around trees will protect the retained trees during construction. Appropriate landscaping and tree management will aid in the long term protection and health of the retained trees. Further details are set out in the accompanying Arboricultural Assessment.

Residential Amenity

Existing Occupiers

- 6.110 Policy DM10 calls for development applications to consider the amenity of occupants and neighbours, taking sunlight / daylight into account. Accordingly a comprehensive Daylight and Sunlight Impact Assessment and Internal Daylight and Sunlight Analysis has been provided to accompany the planning application, confirming the potential significant effects of the Proposed Development with reference to the best practice guidance set out below.
- 6.111 Natural light levels surrounding the site are considered with reference to the Building Research Establishment (BRE) publication 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (commonly referred to as 'the BRE Guidelines.'). The BRE guidelines provide various methodologies and numerical criteria for calculating the potential effect on the existing and proposed light levels received by neighbours of a development site, as well as for calculating the potential light levels within new development. Residential use is generally considered most important, alongside properties and amenity areas that have a reasonable expectation for natural light. As such, only domestic use is proposed to be considered in any assessments.
- 6.112 Neighbouring sensitive residential receptors have been identified along Woodcote Green Road and Digdens Rise, including their associated rear gardens. Daylight and sunlight have been key considerations throughout the design process and have led to changes in the design of the Proposed Development. Mitigation measures have been embedded within the design to minimise the impact to neighbours wherever possible, through the careful orientation and positioning of the proposed massing on the Site, with the principal height sited and angled away from the surrounding receptors.
- 6.113 As such, daylight and sunlight impact testing indicates a high level of compliance to the best practice guidance, demonstrating that the majority of neighbours will not be significantly affected. However, it is anticipated that the proposed development will result in effects beyond suggested BRE guideline levels on a small number of isolated areas, including the property at 46 Woodcote Green Road, which is situated much closer to the site than other neighbours and directly opposite the western site boundary.
- 6.114 The BRE itself advises that the numerical targets are not mandatory, should be applied sensibly and flexibly, and with careful consideration of specific local constraints. Given the number of care homes and support services desired, and the increased density required for its delivery, it is inevitable that

some effects will go beyond the default levels suggested in the guidance. Where more noticeable impacts have been identified, it is considered that there are reasonable contextual factors involved to advocate the use of alternative targets. Nevertheless, the more sensitive living areas will be dual aspect, such that the effects would be offset by mitigating light from other directions, or face away from the site entirely thus will be completely unaffected.

- 6.115 The external daylight and sunlight analysis of the neighbouring buildings has found that the vast majority of windows and rooms tested will satisfy the BRE guidelines in the proposed condition. There will be some isolated daylight transgressions which are below the recommendations set out in the BRE Guidelines, some of which may be noticeable. However in 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. The reduction in light is therefore considered to be acceptable in our professional opinion, and in consideration of the need to determine alternative target criteria in certain circumstances
- 6.116 Overshadowing assessments of surrounding amenity space has also been undertaken to consider the potential effect on the sunlight received. The assessments indicate that all rear gardens tested will comfortably satisfy the BRE guidelines for its key quantitative test.
- 6.117 The proposed development has been designed to take careful account of the amenity of the adjacent residential properties. The site abuts residential properties to the southwest and northwest, while residential properties to the east of the site are located some 50 m from the site, beyond a parking area which is to be retained. The distance to residential properties to the east is considered to address any potential amenity impacts arising from the development. Residential properties to the south of the site are located more than 100 metres from the site and are separated from the site by the Woodcote Millennium Green as well as Woodcote Green Road.
- 6.118 The proposed building on the western side of the site, adjacent to Woodcote Green Road is located next to 40 Woodcote Green Road. 40 Woodcote Green Road is predominantly orientated to the north, with obscure windows understood to be for a bathroom and toilet orientated towards the site, along with a secondary window to a kitchen and a window to a landing. The windows in the units on the western side of the site adjacent to 40 and 46 Woodcote Green Road, have been orientated to the north and west, through an angled façade or have been positioned as high level windows in the façade to avoid overlooking 40 and 46 Woodcote Green Road. It is considered that there is no significant impact on privacy within 40 and 46 Woodcote Green Road. The proposed building is

angled away from the gardens of 40 and 46 Woodcote Green Road, which serves to mitigate any impact on the privacy of the garden areas of this home.

6.119 A landscape buffer is being provided along the length of the western boundary. The landscape buffer would be a minimum of 2.5m and would introduce a continuous hedge, soft planting, and 9 mature additional trees, maximising the privacy of neighbouring properties.

6.120 The height of the northwest corner of the site has been reduced by 1.2m and is situated approximately 30 metres from the rear elevation of the houses at 12 / 14 Digdens Rise. The distance to number 16 / 18 and 20 / 22 Digdens Rise increase to around 35 to 38 metres. The distance between the proposed development and the houses to the west of the site, along Digdens Rise is therefore considered to allow for sufficient setback to mitigate impacts on privacy. The western boundary of the site has a substantial row of trees which provides further screening to the properties to the west of the site.

6.121 The taller element of the buildings on the western side of the site is located some 45 metres from the rear of the houses at number 14 / 16 Digdens Rise and some 60 metres from the rear of the houses at 18 to 22 Digdens Rise. The taller element towards the centre of the site are located some 45 metres from the house at number 46 Woodcote Green Road. These substantial separation distances demonstrate that sufficient regard has been afforded to privacy and amenity of the adjacent properties to the west of the site, in accordance with Policy DM10 of the Development Management Policies Document.

6.122 The proposed buildings, from four to seven storeys are positioned some 47 metres from the house at number 28 Woodcote Green Road. This substantial separation ensures that there will be no material impact on the privacy and amenity of the adjacent properties to the east of the site, in accordance with Policy DM10 of the Development Management Policies Document.

6.123 The lighting for the exterior areas of the proposed Guild Living development will be designed to be sympathetic to the surroundings and enhance specific landscape features at night. For further details please refer to the proposed lighting strategy, which accompanies this application.

6.124 Lighting to the landscape should promote a sense of security and enhance the appearance of the site by night, taking into account current design guidelines and best practice lighting recommendations.

Prospective Occupiers

- 6.125 In accordance with DM10 (part ix) the daylight and sunlight conditions for occupants has been considered. Internal daylight and sunlight analysis of the accommodation within the proposed development shows that most rooms will received daylight levels well in excess of the minimum suggested Average Daylight Factor (ADF) values, while 99% of the proposed rooms tested meet the minimum recommended ADF daylight criteria. 83% windows will meet the Annual Probable Sunlight Hours (APSH) sunlight criteria, many rooms have alternative windows which meet or exceed the requirements or the windows serve less sensitive rooms. The Sunlight and Daylight assessment clearly illustrates that the proposed development would provide more than reasonable daylight and sunlight amenity for future occupants.
- 6.126 Overshadowing assessments of amenity space within the proposed development and surrounding the Site have been undertaken to consider the potential effect on the sunlight received. The assessments undertaken indicate that the scheme is carefully designed to minimise the potential effect on existing overshadowing, while maximising the level of sunlight available within the development. The proposed amenity spaces within the scheme will comfortably satisfy the BRE guidelines for its key quantitative test.
- 6.127 The overshadowing analysis used is based on an area calculation called the '2hrs sun contour' analysis where at least 50% of an amenity area should receive 2hrs of sun on 21 March after the development is in place. The Sunlight and Daylight Assessment confirms that the proposed amenity areas will fully comply with the BRE criteria.
- 6.128 The applicant's assessment concludes that the proposed development is acceptable in terms of daylight, sunlight, and overshadowing, despite a small number of isolated transgressions, which are not uncommon when increasing development levels on a site of this nature, it is therefore considered that the applicant is consistent with Policy DM10 insofar as sunlight and daylight is concerned. For further details please refer to the Daylight, Sunlight and Overshadowing Report.

Highways Matters

- 6.129 Policy CS16 calls for development proposals to facilitate a shift to non-car modes and to reduce the impact of roads and traffic movement. Policy DM36 seeks to secure sustainable transport for new development, through new development providing a travel plan, prioritising the need for pedestrian and cycle access.

Site Access and connections

- 6.130 On Woodcote Green Road there are footways on both sides of the road that are well lit and there is a zebra crossing located between the two hospital accesses. There are several pedestrian crossing points along the A24 Dorking Road.
- 6.131 On-road advisory cycle lanes are marked out on both sides of Woodcote Green Road from Hylands Road in the west to Chalk Lane in the east. A greenway provides a link through Rosebery Park toward the town centre from the corner of Woodcote Green Road and Chalk Lane. Chalk Lane is also a signed advisory route which links to off road cycle routes across Epsom and Walton Downs.
- 6.132 There are bus stops on Woodcote Green Road adjacent to the hospital access and served by bus routes 166, 293, 467 and E5. Epsom Hospital (Stops P, Q and R) are the next nearest bus stops to the site, located along the A24 Dorking Road. Epsom rail station is approximately 1.1km from the site and is accessible by bus routes 166 and 293 from Woodcote Green Road.
- 6.133 An accessibility analysis indicates that the proposed site is in an accessible location and can be accessed by modes of transport other than the private car, including regular bus services from Woodcote Green Road, and that there are a wide range of local facilities within close proximity of the site.
- 6.134 The existing access to the site is located on Woodcote Green Road. This access is for staff only. Woodcote Green Road provides access to numerous residential side roads to the south of the site and joins the A24 at a signalised junction to the north of the site. The A24 Dorking Road is a busy main road which provides links Epsom Town Centre to the north, to Ashted and Leatherhead to the south and access to the M25.
- 6.135 Access and egress to the site is proposed via separate entrance and exit points on Woodcote Green Road, with the entrance located near the south-western corner of the site and the exit located further to the east. A one-way internal route under the west building provides access to a drop-off area to allow residents and visitors to drop off/collect their cars. Drop off/collection for the nursery is provided via the main access where parking bays are provided with vehicles departing via the separate egress.
- 6.136 The site has been designed in a pedestrian friendly manner with vehicle-free access throughout the site and linking to the existing footway and cycle-lane on Woodcote Green Road. It is recognised that some residents at the site will be unable to walk great distances, and therefore buggy/electric

scooter storage and charging areas will be provided within the site. These will enable residents who are not able to walk easily to still travel around the local area on footways.

Traffic Generation and Distribution

6.137 The results of the junction capacity assessments show that three of the junctions assessed would operate within capacity following implementation of the development. The junction of the A24 with Woodcote Side will operate over capacity in the 2026 base scenario, but the addition of development traffic and reassignment of hospital traffic results in a marginal improvement in capacity. On the basis of the results of the capacity test assessments it is considered the local highway network would not be adversely affected following implementation of the proposed development.

6.138 The results of the Accident report received from SCC do not demonstrate any areas of concern regarding safety for the existing highway network. Given that the number of predicted car and multi-modal trips detailed earlier in this report is low, and that the results of the highway impact assessment show that there will be little additional impact at the junctions within the study area, it is considered that the development proposals will not be detrimental to highway safety.

6.139 The Transport Assessment demonstrates that the development proposals will not be detrimental to highway safety and the proposed development will not have a material traffic impact or have a detrimental impact on local highway safety.

Parking Provision

6.140 Policy DM37 calls for new development to demonstrate an appropriate level of off-street parking and that the development meets the car parking standards and cycle parking standards.

6.141 Although the overall number of units proposed is being reduced in comparison to application 19/01722/FULL, the ratio of car and cycle parking remains the same.

6.142 There are 50 secure, covered cycle spaces provided for residents, staff and visitors located throughout the site.

6.143 A two-storey, three level 132 parking spaces parking stacking system is proposed for use by residents, staff and visitors. The parking area within the building is to be accessed via the site access, a drop off area in the vicinity of the reception area will allow cars to be handed to or collected from 24 hour concierge service, who will in turn park cars within the internal parking area.

6.144 The parking area is a three level parking area, with a stacking system. Cars will be driven into the reception of the parking area by concierge and in turn stored within. The use of the stacker system has numerous benefits, including:

- The ability to park more cars into significantly less space
- Reduced CO₂, ECO₂, NO_x and PM₁₀ emissions.
- Reduced running cost.
- Significant energy efficiency improvements compared to conventional car parks
- Improved BREEAM, LEED and Green Star Credit scoring.
- All parking spaces can be used for disabled parking purposes.

6.145 Parking for a further 24 spaces is provided at grade, along the western boundary of the site, this area will also provide the drop off / collection point for the nursery.

6.146 Guild Living intend implementing a number of management and operational measures to reduce the demand for on-site parking, further measures are set out in the Travel Plan:

- Only 40% of Guild Living Residences will be marketed/sold with parking;
- 80% of nursery spaces (children) would be allocated to NHS staff;
- A Car Club vehicle space will be provided on site for use by the wider public;
- Two Private Car Club vehicles will be provided on site for use by residents only;
- A mini-bus for group trips/outings will also be provided on site.

6.147 A parking assessment indicates that the proposed parking provision would be sufficient for the development, and that in accordance with the guidance set by SCC, the parking provision can be assessed on its 'individual merits'.

Travel Plan

6.148 As required by policy CM36, a Travel Plan for the development is being submitted with the planning application and provides further details on car and cycle parking and measures which are to be implemented to reduce reliance on car based travel.

6.149 The submitted Travel Plan seeks to increase awareness of sustainable travel practices and proposes a number of measures to reduce reliance on private care use, as follows:-

- Two car club cars for use by staff/residents and one public car club space.
- Safe and secure cycle storage will be provided within the site.

- Provision of a minibus for organised shopping trips / days out;
- Secure areas will be provided for storage and charging of electric buggies, scooters and wheelchairs.
- Shared computer access area and training/workshops to access travel information such as timetables and journey planners online;
- RTI bus information in Lobby area; and
- A "cycle to work" scheme, secure bike parking, lockers and showers to encourage staff members to cycle to work.

6.150 The specific objectives of the Travel Plan are:

- To achieve a reduction in the number of car-based trips generated by the development during the weekday peak hours;
- To ensure that all parking associated with the development is accommodated within the on-site car park and not on neighbouring roads;
- To achieve a reduction in the amount of single occupancy vehicles entering / exiting the site during weekday peak periods; and
- To increase the number of passengers using the bus services on Woodcote Green Road.

Environmental Considerations

Ecology

6.151 Policies CS3 and DM4 seek to minimise development that is detrimental to biodiversity or to provide adequate mitigation measures, wherever possible development is to contribute positively to biodiversity. Development affecting any site or building that supports species protected by Law, including their habitats, will only be permitted if appropriate mitigation and compensatory measures are agreed, disturbance is minimised and alternative habitats are provided to ensure no net loss of biodiversity.

6.152 Guild Living have commissioned an Ecological Impact Assessment to assess the potential ecological impacts. There are no European sites designated for nature conservation within 2 km of the site. There are five statutory designated sites and 16 non-statutory designated sites within 2 km of the site. The closest designated site is Epsom Common LNR and Epsom Common South SNCI, which are approximately 330m to the west of the site.

- 6.153 The Preliminary Ecological Appraisal confirms that the site is generally of low ecological value, comprising mainly hardstanding and buildings, with scattered trees mainly around the periphery of the site and small areas of amenity grassland and ornamental planting. Trees, ornamental planting and buildings provide foraging and nesting habitat for birds. The narrow strips of vegetation have limited potential to support reptiles and amphibians. While some of the buildings had previously provided potential to support roosting bats, the removal of the building roofs is considered to have rendered these buildings unsuitable for roosting bats.
- 6.154 Further Bat Surveys were undertaken on the site between August and September 2019. No roosts were recorded within the buildings. Additional bat emergence and re-entry surveys were carried out in July 2020, and provide baseline information for the breeding season.
- 6.155 A roost supporting a low number of bats was previously identified in T27, along the western site boundary, this tree has however now been removed by the NHS. Notwithstanding the applicant did mitigate against the loss of this roost by installing bat boxes on site. The western edge of the site where was found to provide foraging, commuting and socialising habitat for various bat species. Several artificial bat roosts have been erected on the site. Measures to avoid impacts to the artificial bat roosts and important foraging area along the western boundary have been recommended.
- 6.156 The Ecological Assessment advises that the demolition of buildings and removal of vegetation at the site could lead to adverse effects on ecological receptors due to habitat loss and disturbance. Construction activities have potential to cause disturbance, as well as lighting during demolition, construction and operation. These effects are capable of being mitigated by way of planning conditions.
- 6.157 The appraisal reports that there are no likely significant effects on nearby statutory and non-statutory designated sites due to noise, lighting or activity during construction or operation. The assessment of habitats and protected species found that the proposed development was not considered to have potential to impact amphibians, reptiles, birds, invertebrates, plants or other mammals, and accordingly no further assessment was deemed necessary. Furthermore, standard measures would be implemented to ensure adherence to wildlife legislation. The landscaping strategy is expected to compensate for the loss of small areas of ornamental planting and scattered trees.
- 6.158 A Lighting Strategy has been prepared for the scheme, which considers the potential for effects along the western side of the site to foraging, commuting and roosting bats. Guidelines published by the

Bat Conservation Trust have been recommended to mitigate any potential impact of lighting on bats. These measures are set out in the Lighting Strategy which accompanies this application.

Sustainable Construction

6.159 Policy CS6 calls for development to result in a sustainable environment and reduce, or have a neutral impact upon, pollution and climate change. The policy states that the Council will expect proposals to demonstrate how sustainable construction and design can be incorporated to improve the energy efficiency of development.

6.160 The design seeks to establish a clear sustainability strategy using energy hierarchy principles of Be Lean, Be Clean, and Be Green and to adopt an approach to reduce carbon dioxide emissions and reduce environmental impact.

6.161 Sustainability has been a key design consideration for this development from the onset of the project and consideration of the impact of design proposals and measures on the sustainable credentials of the development has been made throughout the design development to date and will continue throughout the design and construction process.

6.162 The development includes a number of active and passive measures to reduce CO₂. The passive measures include the specification of high performance building fabric including u-values and an air permeability that are significantly beyond the minimum requirements of the Building Regulations

6.163 The active measures include:

- Insulated pipework to reduce circulation losses;
- High energy efficient heat recovery ventilation; and
- Low energy lighting.

6.164 The non-residential areas of the development will achieve BREEAM 'Very Good', with aspirations of BREEAM 'Excellent'.

6.165 In line with CS6, the development utilises Low and Zero Carbon (LZC) energy technology to reduce the total carbon emissions from the development. To this end 26% of the development's energy will come from LZC energy sources, using a combination of solar photovoltaic (PV) cells and Air Source Heat Pumps (ASHP).

6.166 Sustainable construction measures proposed will seek to include the following:

- Materials with a low environmental impact will be implemented;

- Recycled, sustainable and locally sourced materials will be used;
- All timber and timber-based products will be legally harvested and traded; and
- A resource plan will be developed to minimise construction waste related to on-site construction and dedicated off-site manufacture / fabrication.

Flood Risk and Drainage

6.167 Policy CS6 of the Core Strategy states that “the Council will ensure that new development avoids increasing the risk of, or from, flooding”.

6.168 The Environment Agency (EA) flood maps show that the Proposed Development lies within Flood Zone 1. This means that the annual probability of the site being flooded by fluvial sources (a river or sea) is less than 1 in 1000, i.e. there is less than 0.1% annual probability that the site will suffer from river or sea flooding in any given year.

6.169 Flooding from artificial sources include raised channels, reservoirs, ponds and canals. A review of the EA reservoir mapping indicates the site is not at risk of flooding from a reservoir. Canal and River Trust mapping indicates the site is not located in close proximity to a canal, therefore this source of flooding is not a risk to the site.

6.170 The EA’s Risk of Flooding from Surface Water mapping indicates that the risk of surface water flooding to the site varies from ‘Low’ (<0.1% AEP, 1 in 100 - 1 in 1000 year) to a localised area of ‘high’ (3.3% AEP, 1 in 30 year) at a low point within the centre of the site.

6.171 The Epsom and Ewell Borough Council Strategic Flood Risk Assessment (SFRA) indicates where groundwater may emerge due to geological conditions. This information is shown as a proportion of 1km squares. The mapping indicates that the site is in an area with 25% - 50% susceptibility to groundwater flooding. Based on this information, the site is considered to be at Medium Risk of groundwater flooding.

6.172 The site is located within a Groundwater Vulnerability Zone, classified as a minor aquifer with high vulnerability. Infiltration may be restricted due to the designated Groundwater Zone. If this is the case, discharging to the nearest sewer is likely to be the next favourable solution.

6.173 As the site is at risk of surface water flooding finished external levels should direct flows away from the proposed buildings to low risk areas of the site. Attenuation features should be provided to manage surface water flows. Relevant climate change allowances will be included within the design rainfall run-off events. SuDS techniques are likely to be employed to achieve the required runoff rates,

with the final choice of SuDS features likely to be dependent on ground conditions and further site information. Infiltration measures may be unlikely due to the Nitrate Vulnerable Zone

- 6.174 On-site attenuation features should be provided where necessary, to accommodate reduced discharge off-site during periods of high flow, up to and including the 1 in 100-year return period plus climate change allowance. It is anticipated that the proposed discharge rate will be equal to or less than the existing site discharge in its current usage, therefore the discharge will not negatively impact flooding elsewhere off site
- 6.175 Guild Living's drainage engineers have engaged with Surrey County Council (SCC) in pre-application discussions with regard to the proposed drainage strategy, the details of which are contained in the technical reports which accompany this application.
- 6.176 Mitigation measures have been identified to ensure the residual flood risk can be managed and to provide an appropriate drainage strategy. It is considered that the proposed development meets the requirements of the NPPF as well as local policy CS6 with regards to the drainage strategy and flood risk.

Air Quality

- 6.177 Policy CS6 calls for development to reduce or have a neutral impact on pollution Guild Living have commissioned an Air Quality Assessment, which confirms that the proposed development is not located in an AQMA.
- 6.178 There are sensitive receptors located in the boundary of the Epsom Hospital which will remain during construction of the Proposed Development as well as sensitive residential receptors within 20m of the hospital site boundary in all directions. Mitigation measures will be put in place to manage the effects of construction dust to ensure that the resulting effects will be not significant.
- 6.179 The volume of construction related traffic is below the indicative criteria detailed in the EPUK/IAQM planning guidance, and it can therefore be concluded that the construction traffic associated with the Proposed Development will not have a significant effect on air quality
- 6.180 Operational air quality impacts could arise because of traffic changes on the local road network. The number of LDVs and HDVs arising from the operational development will not breach the indicative criteria detailed in the EPUK/IAQM planning guidance on any one road. It can therefore be concluded that the operational traffic associated with the Proposed Development will not have a significant effect on air quality.

- 6.181 An assessment on potential impacts arising from construction activities has been carried out, subject to appropriate mitigation, the risk from construction dust is likely to be 'not significant'.
- 6.182 An assessment of the potential impacts on local air quality arising from the operation of the Proposed Development has been undertaken. No significant impact is anticipated.
- 6.183 The assessment of emission sources in the vicinity of the development, including traffic, combustion plant and car park emissions conclude that the air quality objectives are unlikely to be exceeded at the proposed development.

Noise and Vibration

- 6.184 Guild Living have commissioned a Noise Impact Assessment. Baseline noise data has been collected around the site and presented in an Environmental Noise Survey Report. Existing noise sources are dominated by traffic on Woodcote Green Road and road network around the site. Sensitive receptors adjacent to the site include hospital buildings located to the north and east, suburban housing located to the west, and external amenity space located to the south.
- 6.185 In order to control plant noise emissions in line with the proposed criteria, acoustic louvre screening around the ASHP's plant area has been recommended. Various mitigation measures for extraction fans have been proposed, including limiting fan speed, using acoustic attenuators and positioning the fans at least 5.5 metres from roof parapet walls. Noise impact from kitchen extractor fans is proposed to be mitigated by upgrading built-in attenuator and building acoustic louvre screening around the extractor fan plant area. No mitigation is proposed to smoke extract fans as attenuators would reduce their efficiency and as these fans would only operate in emergency circumstances.
- 6.186 During the demolition and construction phases, noise and vibration impacts on nearby noise sensitive receptors can be reasonably minimised and continuously monitored.

Contaminated Land

- 6.187 The Ground Contamination Preliminary Risk Assessment reports that there are no sensitive environmental land uses within 250m of the site. There are also no records of tanks, petrol filling stations, Integrated Pollution Control (IPC) authorisations, discharge consents, radioactive substances authorisations, Control of Major Accident Hazards (COMAH), Notification of Installations Handling Hazardous Substances (NIHHS), Part2a, landfill or waste sites on or near to the site. There are no source protection zones (SPZ) reported onsite and no groundwater, surface water or potable water abstractions within 1km of the site. There are a number of streams within 100m of the site.

- 6.188 A ground investigation has identified that the site is underlain by Made Ground over River Terrace Deposits, which is classified as a secondary A aquifer. Beneath this is the London Clay in the north and northwest of the site, the Lambeth Group secondary A aquifer and Chalk principal aquifer. The top 8.0m of the Lambeth Group is a clay which acts as an aquiclude and provides a barrier between the River Terrace Deposits upper aquifer and the lower aquifer in the Lambeth Group and Chalk.
- 6.189 The ground investigation identified hydrocarbon contamination in both secondary A aquifers (RTD and Lambeth Group) in one borehole near fuel tanks in the north of the site. A second borehole located down gradient of the fuel tanks did not identify any contamination. Based on the site history and limited investigations there is low potential for significant contamination on most of the site. However, the potential for contamination increases to moderate near the tanks.
- 6.190 It has been recommended to undertake further ground investigations to ascertain any potential hydrocarbon contamination around the tanks. Any arising requirement for remediation would be defined and agreed with EEBC.
- 6.191 The preliminary risk assessment and initial conceptual site model have identified several potential pollutant linkages (PPLs) associated with the site and the Proposed Development, which have been assessed to pose a low to moderate risk. Further ground investigation has been recommended and can take place following the demolition of existing buildings, contingent on the outcome of further investigation, a remediation strategy and verification plan may be required.

Planning Obligations and Affordable Housing

- 6.192 The use class and the intended occupancy of the proposed care accommodation have been confirmed, in the previous application, to fall within Class C2 of the Use Classes Order, with the Key Worker Accommodation falling under Use Class C3 and the children's nursery under Use Class E.
- 6.193 We note that the Council has recently determined an assisted living scheme submitted by Birchgrove for land at Lower Mill, Kingston Road, Ewell in which a Class C2 use was accepted (LPA Ref: 18/00743/FUL). Guild Living are confident that their operational model meets and exceeds the level of care and support facilities provided within this earlier scheme.
- 6.194 The proposals seek to provide aspirational independent living units at varying levels of affordability. In addition, the Guild Living community is unique in offering a number of rental suites, transitional care suites and key worker accommodation as well as providing public access to an extensive range of communal and wellness facilities.

- 6.195 The scheme will provide 24 residential units on a rental basis for key-workers employed on the wider hospital site. This provision includes the replacement of the existing accommodation in Woodcote Lodge with modern, purpose-built housing. This will provide a low-cost housing solution for essential care and associated staff. Rents will be at no more than 80% of open market rents.
- 6.196 The scheme provides a significant proportion of its floor-space for communal spaces and offering high levels of care and support (as well as delivering the other planning benefits identified above) and accordingly cannot viably 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.
- 6.197 A bespoke affordable housing solution will be required, acknowledging the significant variation outlined in the NPPG when assessing the viability of specialist housing schemes from standard models of housing. Guild Living intends to work closely with the local authority in delivering a scheme that addresses housing choice and which is based on a 'proportionate assessment of viability' (Housing for older and disabled people PPG, paragraph 015).
- 6.198 The development economics of the proposed scheme have been assessed in order to identify the level of planning obligations the scheme can sustain. The Viability Assessment reports that that the Residual Land Value generates a deficit against the Site Value Benchmark, the scheme is considered commercially unviable in development viability terms. The scheme is therefore unable to deliver an affordable housing contribution in addition to replacing the key worker affordable housing units. Notwithstanding the applicant is willing to engage with EEBC with the view of negotiating a financial contribution towards the offsite provision of affordable housing.
- 6.199 As required, the applicant is willing to enter into a satisfactory legal agreement restricting the occupancy of the units and ensuring that the development provides the necessary range of support facilities as set out in paragraph 5.26 to 5.29 above.
- 6.200 Any further planning obligations would be subject to agreement with EEBC and following receipt of statutory consultations. It should be noted that the Scheme is CIL liable and as such the following items are to be funded from CIL payments arising from the scheme:-
- Transport Improvements
 - Green Infrastructure
 - Public Realm Improvements

- Community Facilities
- Leisure Facilities
- Education Facilities
- Library Services
- Healthcare Services

6.201 The scheme is CIL liable and the proposed floor space will be subject to a CIL levy, per the Council's CIL charging schedule as set out below:-

- £27.87: C2 Floor Space (Care Community Accommodation)
- The proposed C3 Floor Space (Key Worker Accommodation) falls within the Council's definition of affordable housing, which is confirmed to be exempt from CIL.
- £209: Class E Floor Space.
- The nursery spaces is exempt from CIL

7 Conclusions

- 7.1 This Planning Statement has been prepared by Nexus Planning on behalf of Senior Living (Epsom) Limited (the Applicant) to accompany a full planning application for the redevelopment of land at Epsom Hospital Site, Dorking Road, Epsom, KT18 7EG. The scheme detailed in this planning statement and the accompanying reports is a updated proposal to take into account the recent decision of the Epsom and Ewell Borough Council Planning Committee on the previous scheme for this site.
- 7.2 The Council cannot show a five-year supply of housing land (with around 1 year supply, i.e. 25% of the requirement), the Council has furthermore delivered 34% of its housing need. Accordingly, Paragraph 11(d) of the NPPF engages the 'tilted balance'. Both the planning statement and the accompanying reports and documents, show that there are no material adverse impacts, which significantly and demonstrably outweigh the very clear housing benefits, as well as other benefits, which would arise from the scheme.
- 7.3 The development provides an opportunity to contribute 292 units towards housing delivery in the Borough, and is aligned to the Council policy statement '*Making the Efficient Use of Land Optimising Housing Delivery 2018*' which serves to ascribe significantly reduced weight to policies DM11 and DM13. The application will also promote the delivery of housing in accordance with the objectives of the Council's Housing Delivery Action Plan.
- 7.4 The proposed development of this sustainable site represents a carefully considered scheme that is in accordance with the NPPF policies on sustainable development and the efficient use of brownfield land. It comprises the development of a new later living community on previously developed land within the urban area. The site is well served by local facilities and will fully complement the mix of uses in the existing settlement.
- 7.5 Overall, it is considered that the changes to the scheme, which have reduced the height, scale and massing of the scheme, reduced the number of units, increased setbacks from the southern boundary and increased the amount of landscaping, address the reasons for refusal of application 19/01722/FUL.
- 7.6 Changes to the orientation and window positions of a number of units on the western side of the site have been made to address potential overlooking and privacy impacts on the adjacent residential properties.

7.7 Care has been taken, in the design of the scheme, to minimise any effect of the development on key views and heritage assets, in this regard the height and design of the proposed buildings has been informed by a detailed Townscape, Heritage and Visual Assessment, resulting in less than substantial harm on heritage resources. Paragraph 196 of the NPPF requires that any development leading to less than substantial harm should be weighed against the public benefits of the proposals.

7.8 The proposal will deliver several public and planning benefits including:

- Addressing a pressing need for specialist accommodation for older people in Epsom and providing housing choice at varying levels of affordability.
- Delivering an exemplar scheme in terms of the standard of facilities and in the provision of support and care.
- Improving wellbeing and social interaction, offering better health outcomes and reducing healthcare costs.
- 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.
- Contributing towards the local five-year housing supply and the housing targets for the Epsom and Ewell Borough.
- Providing modern, purpose-built key worker accommodation for doctors and nurses working on the adjoining hospital site and for staff of the new assisted living scheme
- Freeing up other sectors of the housing market by releasing much-needed family housing accommodation.
- Creating significant local employment opportunities both through the care scheme and the proposed nursery and ancillary uses.
- Supporting the creation of a mixed and balanced community that addresses inter-generational needs and aspirations
- Regenerating a currently derelict site and optimising the use of the land to create a new area of productive and attractive townscape.
- Fulfilling the social, economic and environmental strands to sustainable development as set out in the NPPF and the local development plan.
- Facilitating significant investment into existing facilities at Epsom Hospital through the sale of the surplus land.

- 7.9 The applicant has engaged in detailed pre-application discussions with the local planning authority prior to the resubmission of this updated development proposal and during the preparation of the previous application (19/01722/FUL). Engagement with local stakeholders and the community has also taken place prior to submission.
- 7.10 All technical issues including air quality, energy and sustainability, drainage and water use, transport impacts and ecology have been fully addressed in the supporting documentation; none raise any planning concerns.
- 7.11 The proposal delivers a safe and convenient means of access from Woodcote Green Road and the level of car parking is appropriate to the proposed use and in broadly in accordance with the County Council's standards. Furthermore, the new proposed older persons living community and nursery will be the subject of a Travel Plan to encourage the use of more sustainable modes of transport.
- 7.12 All relevant environmental matters relating to drainage, air quality, noise, ecology and sustainability have been addressed in full within the technical documents accompanying this submission
- 7.13 The development responds positively to the context of the site, which has informed the design, use, scale and layout. The scheme will make use of good quality materials, which create elevations which are rich in detailing which serve break up the form of the development. The well-considered use of high-quality materials and the arrangement of the elevations ground the building and serve to integrate the buildings within the site context.
- 7.14 The updated arrangement of the proposed buildings, responds positively to the site context and townscape though reducing the overall height, scale and massing of structures. The taller buildings are located to the rear of the site, adjacent to the taller retained hospital buildings and have been reduced in height to below that of the overall height of the hospital.
- 7.15 The new buildings will be set within attractive new landscaping and open space provision and improved pedestrian movement through the site to the Woodcote Millennium Green. For these reasons we consider that the scheme will be a positive addition to the street scene and will make a positive contribution to the adjacent Woodcote Millennium Green.
- 7.16 The positioning and orientation of the buildings respects the amenity of neighbouring properties as well as creating a high-quality living environment for prospective residents and occupiers.
- 7.17 In summary, we believe that the updated proposals comprises sustainable development and have addressed the reasons for refusal of application 19/01722/FUL. The proposal accords with the policies



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Appendix 1: Planning Application History

Reference	Description of Development	Decision
00/00815/FUL	Erection of prefabricated single storey building to provide temporary ward accommodation (24 beds) until April 2002.	Granted
00/00966/FUL	Relocation of prefabricated office buildings from adjacent nurses hostel to adjacent the Woodcote wing (Retrospective App)	Refused
01/00444/REM	Amendment to condition 8 of planning permission EPS/97/0329 to permit the occupation of the approved accident and emergency unit without the provision of a multi-deck car park as granted under planning permission EPS/97/0425.	Granted
01/00585/FUL	Erection of single storey extension to new Denbies Wing (proposed A&E department) for use as staff accommodation.	Granted
01/00743/FUL	Erection of a single storey storage building between the Denbies Wing and Day Care Unit.	Granted
02/00612/FUL	Retention of temporary ward accommodation for a further period until 31 December 2005	Granted
02/00646/FUL	Erection of four storey extension to southern elevation of Denbies Wing to provide new entrance, plant rooms and ancillary offices in connection with the proposed use of the Denbies Wing as an Orthopaedic Centre (Amended Plans)	Granted
89/00791/FUL	Erection of glazed front porch to out patients department block.	Granted
92/00217/ZFP	Single storey extension to hospital ward.	Granted
92/00429/FUL	Provision of 74 additional parking spaces (Drawing no. EDH site Dwg Rev B)	Granted
92/00695/FUL	BRADBURY POST GRAD CENTRE, EPSOM DISTRICT HOSPITAL, DORKING ROAD, EPSOM. - Installation of 1.2m. diameter satellite antenna on main block.	Granted
93/00223/FUL	Demolition of buildings and construction of 2 no. four storey buildings, 2 no. three storey buildings, car parking and re-siting of 2 temporary buildings.	Granted
93/00724/FUL	Erection of 5 residential buildings to provide 67 self contained flats and ancillary accommodation, with associated car parking areas, and alterations to access arrangements.	Granted
93/00725/OUT	Phased development including the demolition of some existing buildings; erection of 3 & 4 storey buildings; single storey extensions to the existing	Granted

	day surgery unit; erection of additional floor to existing frontage building; change of use	
94/00109/FUL	Change of use of first, second & third floors from residential accommodation to ancillary offices; partial demolition of existing wing and alterations to existing building.	Granted
95/00799/FUL	Erection of 5 residential buildings to provide 69 self - contained flats & 18 en-suite service rooms & ancillary accommodation, associated car parking & amenity space, & alterations to existing access arrangements. (Revised Plans to earlier	Granted
97/00329/FUL	Demolition of existing ward buildings (Elizabeth & Nightingale) & erection of a four storey building to provide replacement ward & ancillary therapy accommodation together with single storey ancillary plant room and formation of new car par	Granted
97/00425/FUL	Erection of a single deck car park together with alterations to the existing site access, estate roads, car park and landscaped areas.	Granted
: 97/00865/FUL	Erection of roof extension over existing second floor terrace to form an integrated education centre for use as post registration & post graduate accommodation, library, conference rooms and ancillary accommodation for staff, and enlarged e	Granted
98/00170/REM	Application under Section 73 for non-compliance with Condition 6 of planning permission EPS/97/0865 (Condition 6 seeks closure of the western most Dorking Road access)	Granted
99/00781/FUL	Erection of prefabricated building adjacent Rowan House for use as social service offices.	Granted
99/00782/FUL	Erection of single storey extension & canopy,in connection with use of the main building (Denbies Wing) as accident & emergency unit,including ambulance waiting area & 18no.car par	Granted
02/00927/FUL	Erection of single storey extension to York House in connection with the use of the building as a day nursery for children of hospital staff	Granted
02/01306/FUL	Canvas canopies to SW Orthopaedic Centre and alterations to car park layout	Granted
02/01474/FUL	Demolition of existing buildings and extension of pay and display car park	Granted
02/01573/FUL	Amendment to existing permission permitted under reference 02/00646/FUL in accordance with plan nos. 2776/02 (rev F),/03 (rev D)/04 (Rev G) further amplified on drawings attached to letter dated 19th March 2003.	Granted

03/00499/REM	Relaxation of condition 8 of planning permission dated 27 July 1997 as modified by permission ref. 01/00444 dated 26 July 2001	Refused
04/00342/FUL	Erection of a portable building for use as a single storey retail unit by WRVS together with associated works.	Granted
05/00371/FUL	Proposed modular 4 bed observation ward	Granted
10/00876/FUL	Single-storey extension and alteration to existing endoscopy day-case unit.	Granted
18/00976/FUL	The works are in the emergency department of Epsom General hospital premises as follows; 1. The extension of a modular building by three metres to the front elevation by temporarily removing the front module and slot in the prefabricated three metre module in place and put back against the new piece or unit the front elevation that was temporarily removed on new pad foundations. Also the construction of new room to the rear of the modular building (out of site) with new foundation, stud partition, warm floor and warm timber flat roof. 2. The internal refurbishment of adjoining building for the treatment of patients.	Withdrawn as Invalid
18/01571/FU	Retrospective 3 storey Modular Office Accommodation Building.	Granted
19/00295/FUL	Covered walkway, new boundary fence section, relocation of cycle facility, re-provision of VIE oxygen storage facility, double stacking of A&E modular building and paved access route to the North East of Woodcote Wing (Retrospective)	Granted
19/00865/FUL	Installation of a new Boiler House, CHP, Standby Generator and associated plant on Well's Wing second floor terrace, with acoustic screen	Granted
19/01655/SCR	EIA Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people arranged in two buildings comprising 307 care residences and ancillary communal and support services including a restaurant, café, shop, wellness centre, gym, library, craft room, therapy and treatment rooms (Use Class C2), 40 transitional care suites (Use Class C2), 24 key worker units (Use Class C3), childrens nursery (Use Class D1) together with associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space	No objection

19/01676/NMA	Non-Material Amendment to Planning Application ref: 19/00063/FUL, dated 19.07.2019, to remove generator and flue and reposition fuel tanks with metal palisade fence	Refused
19/01722/FUL	Demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people arranged in two buildings, comprising 302 to 308 care residences, 8 to 12 care apartments and 26 to 30 care suites providing transitional care, together with ancillary communal and support services Use Class C2, 24 key worker units Use Class C3, childrens nursery Use Class D1 as well as associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space	Refused
19/01723/COND	Discharge of Condition 7 (Construction Transport Management Plan) of Planning Application ref: 19/00865/FUL, granted 11 October 2019	Granted
20/00108/FUL	Part-demolition, construction of a three-storey extension to the rear of Langley Wing, a bridge link between Langley Wing and Wells Wing at second floor level, a roof garden at ground floor level, internal and external alterations of Langley Wing and plant	Granted
20/00249/FUL	Erection of a multi storey car park comprising ground plus 5 storeys and 527 car parking spaces, reconfiguration of surface parking to provide 104 car parking spaces and improvement to the access road from Dorking Road.	Pending
20/00463/REM	Variation of Conditions 2 (drawings), 5 (minimum vehicles to be parked) and 6 (vehicle parking bays) of Planning Permission ref: 19/00063/FUL, dated 19.07.2019, to allow for two oil tanks, 16 car parking spaces at the Application Site and 14 vehicle parking bays to be permanently relocated at Epsom General Hospital	Granted
20/00711/FUL	The removal and replacement of 6 No. existing antennas and associated steelwork with 12 No. upgraded antennas located on a new stub lattice tower on the rooftop, the relocation of 1 No. 0.3 metre diameter dish to be located on the new stub lattice tower, and ancillary development thereto.	Granted
20/00861/COND	Discharge of Conditions 3 (details of plant) and 4 (noise levels) of planning permission ref: 19/01709/FUL, dated 8 June 2020	Granted

20/00885/DEM	Prior Notification of the proposed demolition of buildings at Epsom General Hospital, including York House, Woodcote Lodge, Rowan House, Beacon Ward, the boiler house and ancillary buildings and structures, under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)	Granted
20/01023/COND	Discharge of Condition 7 (Construction Transport Management Plan) of planning permission ref: 20/00463/REM, dated 13/05/2020	Pending
20/01093/DEM	Demolition of the existing buildings and structures on site	Approved
20/01167/COND	Discharge of conditions 3 (external materials) 7 (construction transport management plan) and 11 (roof garden details) of planning permission ref: 20/00108/FUL, dated 30.07.2020	Granted
20/01299/NMA	Non-material amendment to planning permission ref: 20/00108/FUL, dated 30 July 2020	Refused
20/01322/DEM	Demolition of the existing buildings and structures on site	Approved
20/01412/COND	Application to discharge conditions 3 (demolition tree protection plan and method statement), 4 (construction transport management plan) and 6 (site accommodation, canteen and welfare facilities) of 20/01093/DEM, dated 03/09/2020	Granted
20/01513/COND	Discharge condition 6 (demolition tree protection plan and method statement) of 20/01322/DEM, dated 12.10.2020	Granted

Appendix 2: NHS Land Sale Press Release

The long term future of Epsom and St Helier hospitals

Chief Executive Daniel Elkeles said: “We are pleased to announce that the surplus land in the grounds of Epsom Hospital – which contained derelict buildings and was not needed by the Trust and will not be needed in the future – will soon be home to a unique later living community for the over 65s. This delivers on the commitment we made to sell the land for a social care use rather than just solely residential housing.

“This exciting new development – which is being led by Legal & General – will mean additional age-specific housing for this country’s ageing (with a hospital on the doorstep should they ever need us), as well as additional facilities – all subject to planning permission – which will likely include a nursery, a wellness centre and ancillary retail opportunities. There will also be the ability, should we need it, for NHS patients to access some of the accommodation in the development. Importantly, this will be an extension of the Epsom community rather than a closed-off development, and will benefit local residents and our staff as well as support around 50 new jobs. Legal & General will be starting their planning process and consulting with local residents and stakeholders in the coming months.

“For the Trust, it will mean a more efficient use of the space and land that we own, it will save us money on maintaining and securing disused buildings, and it has unlocked in excess of £15 million of investment into existing buildings at Epsom Hospital and building a new facility for our clinical administrative support staff working at Epsom. They are currently working in a run-down building that was designed to be a nursing home back in the 1920s.”

The investments we are making in Epsom Hospital in the current financial year and into next year, which are in part funded from this land sale, include:

- A new 30 room outpatient facility in Woodcote Wing (opening in spring 2019)
- Replacing all the windows in Bradbury and Denbies Wing (completing in spring 2019)
- A new outpatient therapy centre in Langley Wing (now open)
- Replacing the air handling plant in Wells Wing to reduce summer temperatures (due to be completed in summer 2020)

- Refurbishing some of the lifts at Epsom Hospital (programme throughout 2019 and 2020, with one lift in Bradbury Wing already replaced. An additional lift for Langley Wing is due to complete by summer 2019)
- A new clinical administration building (building underway, and due to be completed in spring 2019)
- Replacing the old steam boilers with a combined heat and power plant (work started and due to finish in 2020)
- Replacing all the lighting in the hospital with modern energy efficient LEDs (work started and will finish in 2019)
- A new decked car park (planning underway and due to be completed in 2020)
- A link bridge from Wells Wing to Langley Wing as part of the redevelopment of Langley Wing that we have secured separate funding for (planning under way and will be completed in 2021)
- Expansion to our Emergency Department and Urgent Treatment Centre providing increased assessment and treatment cubicles (now open)
- External refurbishment of Wells Wing including roof replacement and replacement of window (planning underway and planned completion in 2022).

Importantly, the sale of the surplus land leaves enough space to build a brand new acute facility on the Epsom site (and additional car parking), should the Epsom site be chosen as the preferred location for building a new acute facility. We have already published this report that our local Commissioners produced and it is available on our website.

Explaining the background to this exciting development, Daniel said: “Last year, we began a piece of work to ensure we are making the most of our estate and assets and assessed what land we have but don’t use, and the areas within our grounds that we will never need.

“We identified some parts of the Epsom site, containing the derelict York House and old accommodation block, as surplus to our current and future needs. It is therefore suitable to sell to the public sector, and this plan was approved by our Trust Board in April 2018.”

Daniel added: “As lots of local people are aware, because of our ageing buildings and the way our services are currently configured, Epsom and St Helier cannot continue as we are forever. To secure a long term future that is clinically and financially sustainable, we need to build a state-of-the-art, brand new facility (on one of our existing hospital sites) where our sickest patients will be cared for. Before any decisions are made, there would be a public consultation led by the Clinical Commissioning Groups so that local people can have their say about where they think this new facility should be built. Importantly, we have ensured that we have enough space remaining at each of our three hospital sites to build a new acute facility.

“A development of that size will of course take some years to complete, and in the meantime we cannot stand still. We have to sort out the many, many issues we have with our existing buildings.”

[Please see presentation on Landsale from Trust Board meeting on 15 March 2019.pdf \[pdf\] 739KB \(opens in a new window\).](#)

[Please see presentation update given at Epsom and Ewell Local Committee meeting on Monday 25 March \[pdf\] 1MB \(opens in a new window\)](#)

