

# Epsom Civic Society

shaping the future, safeguarding the past

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11 August 2014

Contact Officer: John Robinson

Our Ref: ECS/RHA/14-04

Dear Sir,

**14/00561/OUT, 14/00562/FUL, 14/00563/LBA: The Royal Automobile Country Club, Old Barn Road, Epsom, Surrey KT18 7EW. Residential development, restoration work to listed buildings, construction of a spa and driving range, reconfiguration and extension of car park, etc., etc.**

These three applications relate to a master-plan for the development Woodcote Park over the next twelve to fifteen years. The applications are very well presented and are accompanied by a wealth of detailed information. The Society does not have the resources to consider in depth all the material, but has a number of observations which we feel must be taken into account in considering the applications.

The critical need for housing is putting the Green Belt under pressure and its boundaries are, quite rightly, being reviewed through various mechanisms. The Society endorses the need for such reviews but remains strongly opposed to arbitrary intrusions into the Green Belt, especially while such reviews are in progress. Thus we are, as a matter of policy, opposed to the outline application (14/00561/OUT) for two residential plots in The Ridge.

This part of the master-plan is described as 'enabling development'. While this is briefly mentioned in the NPPF, it has no formal standing and conveys no special attributes to the subject of the application. We note that the proceeds of this development will be placed in an escrow account and used solely for the renovation of the Walled Garden and Gardener's Cottage in Woodcote Park, under the terms of a section 106 agreement.

A legal view regarding enabling development is that, as a matter of public policy, it should not provide an easy way out for owners of listed buildings (or other heritage assets) who have failed to take reasonable care of them. The RAC was founded in 1897 and built its clubhouse in Pall Mall in 1911; Woodcote Park was acquired in 1913. It is not unreasonable to suggest that the Club should have budgeted for repairs to its buildings during its century of ownership and the need to repair the Walled

Garden and Gardener's Cottage at this point in time might reasonably be seen to stem only from the current proposals to expand its facilities.

The Society is also concerned by the greatly increased level of activity in the Park. From the figures provided in Table 4-1 of the Transport Assessment (TA) it is possible to estimate that the proposals will result in an increase of some 62% of the floor space including, in particular, a spa and the 179 seat Motor Heritage Wing, presumably intended to be used as a conference centre. From Figures 5-1 and 5-2 in the TA the increase in traffic is estimated to be only 36%. Compared with the increase in floor area, this large discrepancy is counter-intuitive and while it might partly be explained by the different building usages, the duration of the various activities and by existing users widening their use of the facilities, this difference nonetheless seems excessive. For example, both the Spa and, particularly, the Motor Heritage Wing must be expected to generate an entirely new and additional clientele.

The proposed car parking provision shows a similar disparity in that it is proposed to increase the parking by only 23%. The increase in parking provision of only 89 bays seems inadequate particularly when viewed against the size of the conference centre. It is also striking that the predicted peak parking accumulation is estimated to be 477 vehicles, exactly the same as the proposed provision (Figure 4-1 and Table 4-5). This is patently unlikely. In any event, it is usual to allow 5-10% additional spaces to cater for the inefficient use of parking, which is particularly important here where the parking provision is scattered about the site in 6 separate car parks varying in size from 27 to 169 bays. Finally, users of the existing facilities report that parking on the site is at present frequently difficult; it is clear that it will be even worse in future.

There is an absence of an assessment of the impact of the additional traffic on the nearby road network. The traffic analysis shows the north/south split of traffic approaching being split roughly equally. Much of the traffic from the south must be assumed to come through Ashted Park or by using Farm Lane. In either event, this will lead to a highly undesirable increase in traffic using these very difficult routes.

Overall, it is difficult to escape the conclusion that the TA takes an unduly optimistic view of the future situation, adding greatly to the Society's concerns about this development.

While appreciating the potential economic benefits to the local community that the master-plan may in due course provide, membership of the Club is restricted, and is limited to the more affluent members of society. This is not a reason to oppose the application per se, but it is a reason to oppose the so-called enabling development. In addition to forming an unfortunate precedence, the proposal to build within the Green Belt provides no compelling benefits to the wider community, and seems simply to underline the Clubs failure to maintain the listed Walled Garden and Gardener's Cottage, while assisting in providing additional facilities within the Master-plan. Although the proposals may result in some additional employment, it is noted that the office space will be reduced by some 333sqm. In normal circumstances such a space would accommodate about 30 employees, but the documents do not reveal if this is underutilised, or if those currently occupying the office are to be relocated, presumably out of the Borough.

The Society is thus firmly of the view that application 14/00561/OUT should be refused. With regard to 14/00562/FUL, while the spa might be regarded as a reasonable addition to the recreational facilities of the club, the Heritage Motor Wing would appear to be an entirely commercial undertaking wholly inappropriate in the recreational context of the remainder of the site. We are deeply concerned by the greatly increased activity in the site as implied by the markedly increased facilities, and by the resulting traffic and parking demand, which it would appear might be significantly underestimated. We suggest that the council refer the Transport Assessment to an appropriate third party for a rigorous review and, if necessary, the scale of the master-plan should be curtailed.

Yours sincerely,

Robert Austen BSc CEng MICE MCIHT  
for Epsom Civic Society

cc Chair, Planning Committee  
Ward Councillors

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