

Epsom Civic Society

shaping the future, safeguarding the past

Viv Evans
Epsom & Ewell Borough Council
Town Hall
KT18 5BY

18th March 2021

Dear Viv

Ref - Planning Application 21/00252/FUL – Epsom General Hospital - Objection

Epsom Civic Society has reviewed the details of this latest application for The Guild Living scheme at the hospital. The redevelopment of the site is to provide 267 care residencies, 10 care apartments, 28 care suites and 24 key worker units.

We have based our review on the application presented at this present time rather than the adjustments made by the developer to their 19/01722/FUL application. The ECS continues to object to the developer's proposal.

The last year has seen a major step in Government legislation with regard to Tall Buildings. A London Plan has been published in March 2021 named The Spatial Development Strategy for Greater London. Local Boroughs are advised to use this strategy as a guide for their own developments. Section D9 states that 'Tall buildings should only be developed in locations that are identified as suitable in Development Plans'. Sections D11 & 12 address the visual impacts under the following headings :-

Long range views –

These require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.

Mid range views -

Range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.

Immediate views –

It should have a direct relationship with the street. Where the edges of the site are adjacent to buildings of significantly lower height there should be an appropriate transition in scale.

It is acknowledged that Epsom and Ewell is not within the GLA area and that authority's planning policies do not apply, however, the Society considers that the new proposals have a strong and persuasive relevance here, in that any proposed taller buildings need extremely careful consideration.

We are still directed by the National Design Guide (2019) which is intended to be used when assessing planning applications. This code sets out 10 characteristics that form good design. This includes 'Local Identity' and that well-designed new developments should be influenced by :-

- Appreciating and Understanding of vernacular
- Local or regional character & identity – Inc height, scale, massing and relationships between buildings
- Existing build form
- Existing landscape
- Local Architectural Precedents
- Views, vistas and landmarks
- Scale and proportions of buildings

The more recent National Model Design Code also provides typical parameters for 'urban neighbourhood' areas of 12m eaves heights (and densities of 60-120 dwellings/ha) and 'suburbs' of 9m eaves heights (and densities of 30-50 d/ha). We are concerned that the applicant has failed to comply with this national design advice as their scheme has a density of 218 d/ha and a height of approx. 27m (plus lift motor room/plant) whilst the appearance fails to respect the suburban residential surroundings.

The draft revisions to the National Planning Policy Framework published in January 2021 include policy changes in response to the Building Better Building Beautiful Commission "Living with Beauty" report. This proposes in a new Paragraph 133 that 'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design'.

This is a very large development wedged into a modest site and as such presents excessive height, bulk and massing. Thus, it is at odds with Policy DM 9 – Townscape Character and Local Distinctiveness.

The scheme is incompatible with Policy DM 10 – Design Requirements for new developments. The site is situated on a 'back road' rather than the main Hospital on Dorking Road. Respect is required to the privacy of the residences in Woodcote Green Road and Digidens Rise. Many of the new units look directly into the bedrooms and

gardens of these properties. This represents a completely different situation to the existing hospital buildings at this south east boundary.

We are also concerned at the recommendations stated in the Hoare Lee Fire Engineering Stage 2 Report. Although stating that the design generally complies with the British Standards there are several areas for further development. The proposed 'Stay Put' strategy is of obvious concern and we strongly suggest that this is continually reviewed as the Grenfell Tower Inquiry progresses and its recommendations are taken on board. It is obvious that when dealing with high rise residential developments approvals a completely different level of competency is required.

The ECS disputes the conclusions stated in The Heritage Townscape and Visual Impact Assessment prepared by Donald Insall Associates. They recommend that the scheme is 'sympathetic to local character and history, include the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. The proposals would have either no impact or a negligible impact on the significance of the majority of the surrounding heritage assets'. This is certainly not the case as the new buildings dwarf the adjacent Woodcote Green Road properties, The Digden Rise dwellings and the delightful sylvan setting of the Woodcote Green pond.

We note that there are doubts over the requirement for a Care facility of this size for the residents of Epsom. New and existing local care homes are either closing or are not being sold. Building new care facilities and then converting to open market residential because they can't sell would be the worst possible outcome for Epsom and the Woodcote Estate. This would include the failure to deliver the affordable housing a development of this scale would contribute.

There is potential for the proposed leisure facilities described as being open to the general public could dilute the cohesion of the Town Centre. The hospital site is in a residential area and not a high street location.

In conclusion The Epsom Civic Society strongly objects to the scheme proposed as it is too high, bulky and over developed. It will have a serious impact on the surrounding green environment also its effect on the close by Chalk Lane Conservation Area.

Yours Sincerely,

The Epsom Civic Society (Bob Hollis)

