

Epsom Civic Society

formerly Epsom Protection Society

shaping the future, safeguarding the past

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The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN



13th July 2022

Dear Mr Pocock

Ref: APP/P3610/W/21/3287870 Multi-Storey Car Park (MSCP) at Epsom Hospital

1) The Epsom Civic Society (ECS) welcomes the opportunity to explain our case for objecting to this application, (Reference 20/00249/FUL). We have closely followed the decision-making process along with the review of new and amended design information and have submitted objections to the initial and amended plans. We fully support the refusal of the proposed development by our Local Authority.

2) The application was first validated in 2020. During this last 2 years there have been several other building schemes at the Hospital that have received planning approval or are being considered at present. These projects interrelate to the MSCP proposal with concern to car parking spaces, occupational conditions based on car parking and access trafficking. One of the major related schemes has been the Guild Living project at the rear of the site. Although gaining planning permission on appeal the site remains dormant following the closure of many parking spaces. ECS strongly suggests that the lack of co-ordinated planning by the Hospital has resulted in the current impossible car parking situation.



3) The other advance of the last 2 years during the proposal's decision period has been sustainability issues concerning the use and purpose of private car journeys. Other conditions and regulations have also advanced under the climate change agenda and related action plans and we understand that these will all go to inform the draft Epsom & Ewell Local Plan, whose Regulation 18 consultation is scheduled to begin in Autumn 2022.

Response to Appeal

4) We support the Planning Committee's reasons for refusal:

Reason for refusal 1:

The proposed development by reasons of its height, mass, scale and poor design (including its roof form, and choice of specified materials), would adversely impact and harm the character and appearance of the area, 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 2, 122 and 127 of the NPPF (2019).

Reason for refusal 2:

The proposed development, by reasons of its height, mass, se and poor design (including its roof form, and choice of specified materials), would fail to preserve or enhance the character or setting of the adjacent Woodcote Conservation Area, failing to comply with Policy CS5 of the Core Strategy (2007), Policies DM8 and DM9 of the Development Management Policies Document (2015) and paragraphs 2, 193, 196 and 202 of the NPPF (2019).

5) The proposed stand-alone six storey car park (ground level plus five storeys above) is a utilitarian structure with a large bulk and mass and a bland, boxy design devoid of any quality architectural features. It is a significant intervention on this part of the hospital site, that currently provides surface-level parking only.

6) The location of the proposed MSCP is immediately adjacent to the Woodcote Conservation area, it is also near to the Chalk Lane Conservation Area and in addition may have adverse impacts for the southern part of Worple Road Conservation area bordering Avenue Road. The proposed MSCP will adversely affect the setting of three listed buildings on the north side of Dorking Road (East Lodge, the Bell House and Clock House Medical Centre) and the row of positive buildings on the South side of Dorking Road. The visual impact on these properties and on the neighbouring Tennis/Sports Club

is horrendous. Further along Dorking Road is Hylands House, a Grade II* Listed building. The overall detrimental effect and harm to nearby heritage assets is, the Society's view, substantial. The Society does not agree with the submitted Planning Statement that what is proposed will result in limited harm only. It is considered that the proposals represent serious harm to the conservation areas. The Society's view is supported by the recent appeal decision regarding 22-24 Dorking Road (20/00031/REF).

7) The proposals present a large overpowering building which will have an adverse visual impact upon the adjacent Sports Ground. The proposed height cannot be sustained. Written advice dated 29 November 2019 from the planning officer to the applicant stated, "In principle, a six-storey car park is not considered acceptable at this Site. There may be scope for a smaller building, which should not exceed three storeys in height ... The provision of a three-storey car park may be acceptable, subject to a Visual Impact Assessment, which would determine the appropriate height of this."

8) The proposals would be contrary to Core Strategy (2007) Policy CS5 (Heritage Assets and their setting); DMP Doc (2015) - Policy DM9 (Townscape Character and Local Distinctiveness) and DM10 (Design Requirements for New Developments); and DM13 (Building Heights). The Society agrees with the local authority that a 3 storey not higher than adjacent hospital block may be acceptable, subject to conditions and supports the local authority's Conservation Officer's comments of 9 March 2021.

9) In the current context of climate change policy and the need to reduce private car travel, a building of this bulk and mass is likely to be very harmful and cannot be sustained. It is difficult to justify in light of the Borough's Climate Change Action Plan supported by the Council at their 20th January 2020 meeting. In addition, it is not compliant with Core Strategy Policy CS 6 (Sustainable development etc) and CS 16 (Transport and Travel) and nor with the NPPF (Chs 9, 12,16).

10) In terms of health and well-being, locating a car park of this size adjacent to the well-used public right of way risks increased exposure of the public and in particular schoolchildren (often via the 'walking bus') to poor air quality from increased levels of vehicle emissions.

11) Amended plans (ECS notified 24 February 2021) with revised cladding details to improve on the blandness on the fenestration fail to overcome objections set out above, nor do they take into account Covid lessons on the importance of supporting our residents on healthy living and leisure amenity use.

12) Minor design amendments relating to the reduction of height by 1m, the addition of 2m wide green living vertical walls, removal of high-level perforated panels have managed to make the building more unsightly than the original proposal.

13) The proposed MSCP is incompatible with Surrey County Council's requirement to reduce the number and length of individual car journeys for all residents and encourage the move to zero emissions vehicles for journeys that cannot be made on foot, by bicycle or public transport, as set out in Surrey's Climate Change Strategy, Surrey's Greener Future, and taken forward and supported by Epsom & Ewell's Climate Action Plan, and revised E&E Sustainable Design Supplementary Planning Documents.

14) Having reviewed the appellant's statement of case on the LA's refusal, we have the following comments.

- The LA throughout have suggested that a 3-storey height block would be more suitable for the site. The current design shows a 20m high block extending 5.63m above the immediately adjacent Hospital building. This produces a tunnelling effect to the main ambulance route at ground level.
- The ECS strongly refutes that the benefits outweigh the harm in this locality. There is a severe balance of harm to the local heritage assets. This is accurately described in the LA's Conservation & Heritage Officer's Report. (9th March 2021).
- The design is still inadequate and is not acceptable. The architect has developed a 'palette' of various cladding materials that do not work together eg one red brick wall, one precast concrete face, metal coloured fins. It portrays an ongoing design rather than a design that should have been co-ordinated and presented in the first place. The structure appears to be steel frame bearing on piled foundations, with precast concrete beams and a reinforced concrete central core and access/lift shafts.
- We dispute that there are any benefits to traffic movements and fail to see where the Appellant proves their point. Likewise, there are no A&E emergency access improvements. Problems will occur at the 'valley' roadway between the blocks, impairing vision and vehicle movements.

- There will be no parking improvements to any local roads. All have current parking restriction orders which are adequately managed by the LA enforcement officers.

The Epsom Civic Society welcomes the opportunity to participate in an appeal Hearing and to demonstrate our strong objections to this poorly conceived and inappropriate application.

Yours sincerely,

Bob Hollis (Vice Chair of The Epsom Civic Society)

