

Epsom Civic Society

formerly Epsom Protection Society

shaping the future, safeguarding the past

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Victoria Potts BA(Hons) DIPTP, MRTPI
Head Of Place Development
Epsom & Ewell Borough Council
The Town Hall
Epsom
KT18 5BY

31st August 2022

Dear Vicky

Ref Planning Application 22/00923/FUL Former Police Station and Ambulance Station

The Epsom Civic Society in principle support this application, however there are several challenges that need to be addressed prior to approval. These points are considered within this letter.

The proposed development of the former Police Station site and now along with the adjacent current Ambulance Station has been of considerable interest over the last 4-5 years to Epsom Civic Society. We have reviewed and commented on several schemes, most recently the proposal for a 60 apartment extra care scheme (19/01589/FUL) which was subsequently withdrawn.

This current proposal is for a new 96-bed residential, nursing and dementia care home for the frail elderly (Use Class C2) within a 3 to 5 storey development together with a basement parking level.

We realise that this site has an extant permission for the erection of two residential blocks comprising a total of 29 residential units on the former Police Station part of the



application site (17/01586/FUL) which incorporated a contemporary 4 storey building fronting Church Street with a smaller 3 storey building located to the rear. We also acknowledge that this site is identified as falling within the Site G opportunity site specified within Plan E and is included within the Upper High Street, Depot Road and Church Street Development Brief (SPD) Important planning constraints are the site's location adjacent to the Church Street Conservation Area, the proximity of certain listed and locally listed buildings as well as protected trees within and adjacent to the site.

We remain concerned about the proliferation of specialist elderly accommodation within the Borough, especially given the outstanding need for general housing and affordable housing as well as the importance of supporting the vitality and viability of Epsom town centre. However, given the Inspector's conclusions on the Guild Living Scheme in September 2021 we do regrettably accept that it is unlikely that any objection on the grounds of an over-provision of elderly housing and failure to meet priority housing needs would be supported on appeal. This highlights the urgent need for an up to date Local Plan that can deliver on meeting local needs.

We are pleased to see that the scale and form of the development relates better to its context than earlier schemes. We welcome the fact that the layout broadly accords with the suggested layout set out in the Development Brief, respecting existing street setbacks and stepping down from the 4/5 storey scale at front of the site, adjacent to Church Street to the 2/3 storey scale at the rear adjacent to the 2 storey housing in The Parade and heritage assets to the south-east of the site.

We note that the 5 storey element of the scheme conflicts with the 12m height restriction set out in Plan E but accept that this guidance is probably now superseded by design guidance in the NPPF as well as the Council's Making Efficient use of Land policy statement. Moreover, we consider that the recessing of the fifth storey successfully reduces the visual impact of the additional storey upon the street scene.

In terms of the design of the development and materials of the development we welcome the detailed articulation of the facades and varied use of materials (including different shades of brick, stone and bronze aluminium to break down the mass of the buildings.

We therefore agree that this proposal would succeed in conserving and enhancing the designated and undesignated heritage assets adjacent and near to the site in accordance with Policy DM8 and paragraphs 202 and 203 of the NPPF. We also



consider that the proposal in terms of its form, scale, design and use of materials would positively contribute to the character and distinctiveness of the local area.

Epsom Civic Society places great importance on any development of the site safeguarding the protected trees within the site and ensuring that the magnificent cedar tree on the Church Street frontage is not in any way compromised. The protected existing trees are of high amenity value and we are pleased that the layout allows for their protection and the proposed planting of a further 25 trees will further contribute to the site's green infrastructure and enhancement of biodiversity.

We recommend that special attention is made for the protection of the retained trees. At the Developer's briefing exhibition, it was stated that the foundations and basement would be piled. This operation, if not correctly managed could seriously damage the tree roots. The Council's Tree Officer should sign off the Contractor's proposed Method Statement and ensure all protections are in place.

The Epsom Civic Society are also concerned that safeguards must be put in place for the key demolition works. The buildings may have a high asbestos level and contamination challenges could arise affecting the adjacent residencies. Suitable protection measures must be installed along with perimeter site monitoring sensors.

One outstanding issue that has not been fully resolved is the possible flooding risk arising from the basement car park within the site and associated risks to certain nearby properties. We question whether it is acceptable to condition details of the design of a surface water drainage scheme when this is critical to ensuring that recent surface water flooding problems in the area are not exacerbated by this development.

In conclusion, The Epsom Civic Society support the scheme but strongly recommend that on this sensitive site all safety measures and environmental protections are put in place prior to the start of the construction works.

Yours Sincerely,

John Mumford
Bob Hollis

