

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

28th November 2022

Dear Vicki,

Ref Planning Application 22/01653/FUL Kingswood House School, Objection

The Epsom Civic Society are very concerned at this proposal to close the existing Kingswood House School and to construct a SEND school on part of the site. This is one of the Borough's most distinctive locations and sits within the Stamford Green Conservation Area.

Whilst the ECS is concerned at the potential loss of a thriving school which is an Asset of Community Value and its replacement by a much smaller specialist school, we understand that the demand for the existing school is immense but there is minimal demand for the proposed SEMH school at this particular location. Our Council have granted the school ACV designation and we suggest that this benefit is diligently supported. There is no justification for the loss of this Community School and the reduction of a major area of education floorspace. This is contrary to Policy DM34.

The ECS are concerned at the effect of the altering needs of a specialist school compared with the existing current operations. This change in purpose has been not taken into account regarding the change in spatial and amenity requirement of the new



pupils. These specialist needs include the access and drop off requirements by the parents and private buses. The main access route for the pupils shows as remaining from West Hill Avenue. This highway is approximately 5.5m width, with room for cars to be parked on one side only. The SEND pupils will need a longer drop off time and to be escorted to the new school. This narrow road will not be able to cope with this situation which occurs at the start and end of the school day. There is no alternative provision for a sensible dropping off facility for the pupils. These access and parking arrangements are non-compliant with DfE guidelines for SEMH pupils and are potentially unsafe. We suggest that compliance to Policy CS16 Managing Transport and Travel of the core strategy (2007) is woefully lacking.

The demolition and site plans drawings indicate that staff parking and access will be from Clay Hill Green, at the south of the site. This means that existing school buildings are being replaced by staff car parking. We suggest that only 'green' parking and cycling should be encouraged in compliance with the latest sustainability directives.

The Stamford Green Conservation Area is a truly special place. This area is a key asset in the delightful range of CA'S within our Borough. An Article 4 (2) Direction came into force in February 2000 and demands that this CA is respected within all Planning Applications. The Kingswood School is a principal focal building situated adjacent to Clay Hill Green. Article 4 requires that the new hardstanding parking arrangement would be the subject of a separate Planning Approval.

The CA requires that 'Alterations, improvements and extensions to buildings and to the setting of buildings within the Conservation Area should respect the character and historical context of the property and surroundings through the use of traditional materials and historically correct design'. We do not believe that the proposed design incorporates these CA requirements.

We note that an ecology impact study has not been fully undertaken. Therefore, it is not possible to understand what protected species could be affected by the proposed development. The council's Ecology Officer has made the same observation and that any planning approval is at risk pending the review of ecology. We fail to see where the proposed development can enhance the beauty of this most precious CA.

One of our main concerns is the Developer's stated proposal to build residential dwellings on the existing school field adjacent to West Hill Avenue. The planned works for the current scheme releases this field from school sports use. This 'piecemeal'



planning approach cannot be supported by the Society and the Developer's overall intentions should be taken into consideration when reviewing this application. Risk of piecemeal development is capable of being a material consideration in planning (*Rugby School Governors v Secretary of State for the Environment* [1975] JPL 97) and we urge the authority to refuse this application until such time as the landowner has: a) agreed a masterplan for the entire site in their ownership, edged in blue on the plan in the Design and Access Statement (p2), in the interests of site optimisation; and b) entered into a legal agreement to build the school irrespective of any subsequent grant of planning permission for residential dwellings on the remainder of the site.

The proposal is therefore considered not to comply with the requirements of Policy CS5 that states inter-alia that 'Development should make efficient use of land and have regard to the need to develop land in a comprehensive way.'

The Developer's intention to split the site into two components also leads to the risk that, whilst the Residential Site (Existing School Field) could gain planning approval, the new SEMH school would never be constructed. This could lead to the distinct possibility that further dwellings (Phase 2) would be built on the existing school site.

The proposed works will create challenges throughout the construction process. We suggest that a comprehensive Construction Management Plan is prepared and discussed and agreed with all parties, prior to Planning Approval. The site access arrangements are of key concern as both entry points from West Hill Avenue and Clay Hill Green are very restricted.

In conclusion, The Epsom Civic Society strongly objects to this proposal. There is no robust reason to replace an existing thriving school with a much smaller specialist school. The change of operational use will severely affect the tranquillity and sylvan nature of this most delightful location. The current application is piecemeal and premature.

Yours Sincerely,

Bob Hollis (Vice Chair of The Epsom Civic Society)

