

# Epsom Civic Society

shaping the future, safeguarding the past

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

28<sup>th</sup> April 2021

By email

Dear Viv,

## **Ref - MSCP at Epsom District Hospital 20/00249/FUL: Climate Change & Sustainability Concerns**

Further to our previous two letters of objection to this planning application we have taken the opportunity to review this proposal in conjunction with current guidance on climate change, sustainability and the environment.

This review of the MSCP focuses on the sustainability impacts of the proposed development. Notwithstanding the legally binding national commitments to achieving net-zero climate emissions by 2050 and the new targets of 78% reduction in emissions by 2035, the following documents are referred to assess the “compatibility” of the proposed development with regard to:

- **Surrey’s Climate Change Strategy- Surrey’s Greener Future (2020)**
- **Epsom and Ewell Borough Council Climate Action Plan (adopted at full council on 23rd July 2019)**
- **Revised Sustainable Design Supplementary Planning Document, EEBC Feb 2016**

### **1) Surrey’s Climate Change Strategy, Surrey County Council (2020):**

The document aims to establish the approach for how Surrey’s LAs and other partners will work together to put the county on the path to net zero carbon emissions. Surrey CC and its 11 LAs have collectively recognised the severe and imminent threat that climate change poses and have declared or recognised that the climate emergency. “Surrey County Council in declaring its climate emergency committed the County to becoming net zero carbon by 2050 at the latest. The public declaration of a net zero carbon target commits all local authorities in Surrey to tackling climate change across every aspect of our service provision and estate in conjunction with action by residents, businesses and partners”.

The ambitions for SCC are GreenHouse Gas (GHG) emission reductions of 46% by 2025 and 67% by 2030. Of particular interest in this document are the “Transport and Air Quality” and “Buildings and Infrastructure” sections.

**1.2: “Transport and Air Quality” section:** states that emissions associated with Surrey’s Transport sector amount to 46% of the County’s total (2019) emissions. The County carries almost twice as much traffic than average for the South East (despite good travel links). Roads have 66% more traffic than national average and just 10.8 % of residents walk or cycle to work.

The ambition statement is, “Deliver and promote an integrated accessible, affordable and reliable public and active (walking or cycling) transport system across the County, thereby reducing journeys and improving local air quality for improved health and wellbeing of our residents.” Target is 60% reduction in the transport sector by 2035 compared to 2019.

The document has 3 strategic priorities (further details not listed here are included in the document’s appendices with timeframes of 2022 and 2035).

**Strategic Priority 1 (SP1)**

Prioritise investment in place-based development<sup>16</sup> that creates well-connected communities close to high quality places, spaces and services to reduce the number and length of car journeys for all residents.

**Strategic Priority 2 (SP2)**

Invest in initiatives and infrastructure to increase the uptake of walking, cycling and public transport, alongside schemes to reduce reliance on the car e.g. ultra-low emission zones, pedestrianisation and car-free zones.

**Strategic Priority 3 (SP3)**

Invest in and support the development of the infrastructure required to support the move to zero emission vehicles for journeys that cannot be made on foot, by bicycle or public transport.

<sup>16</sup> Place-based development refers here to economic development centred upon existing assets or services within a community.

Of particular interest is Annex 1, Section 1.2 (p62), “Develop a county-wide Electric Vehicle strategy by 2021 with an ambition to provide a network of town centre/key location charging points. Charging points will span the 12 local authorities and include fast chargers (SP3).”

**1.3 Annex “Housing and Planning” section:**

Under housing and planning (p68) is the Strategic Planning objective by 2022 to “Develop cross-authority supplementary Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document guidance which seeks to embed climate change considerations into local development”.

**1.4 “Buildings and Infrastructure” section:**

Refers to commercial buildings and infrastructure and emissions represent 13% of Surrey’s total amount (p34). It states that, “For future buildings there is a need to think more holistically, considering the whole building lifecycle. This includes consideration of embodied carbon [...] which can account for up to 70% of a buildings’ total lifetime emissions.

“Thus, tackling these emissions [...] requires considerable coordination between different government bodies, with businesses, notably the construction industry and with residents.” (p35).

The ambition statement (p35) is to “Drive forward the transition to a zero-carbon built environment through the pursuit of lower operational energy use, increased supply of renewable energy to Surrey’s buildings and reduced embodied carbon associated for example with construction. The Strategic Priorities (p36) are listed as (with further details ~~not listed here~~ are included in appendices with timeframes of 2022 and 2035):

**Strategic Priority 1 (SP1)**

Significantly improve the energy efficiency standards and practices of commercial buildings in Surrey to reduce energy consumption whilst reducing the cost for businesses.

**Strategic Priority 2 (SP2)**

Review and update planning policy to produce infrastructure that is better integrated, enabling the delivery of wider ambitions on local renewable energy generation and vehicle electrification.

**Strategic Priority 3 (SP3)**

Work with stakeholders to develop a systems-based approach to development and infrastructure that considers the whole-life cycle of construction, including water consumption, and promotes the integration of green infrastructure for climate change adaptation.

## **2) Climate Change Action Plan, Epsom and Ewell Borough Council, (2019)**

This document sets out the actions to help the Council meet its climate change target for 2035 for the Council’s operations to be net carbon neutral. The document is split into 6 key themes across a 4-year period. Of interest in this application:

**Year 2, Theme 1, Point 3:** “Devise opportunities to shift away from reliance on cars to travel in the borough.” - “Work with SCC and HA and other relevant providers to look at local transport infrastructure and develop a plan to support moving away from car use.” Deadline March 2021.

**Year 2, Theme 3, Points 9-11:** “Implement a network of public electric charging points in the borough.” - “Increase walking as an alternative to car use.” - “Installation of new pedestrian signs and street maps to encourage walking as part of Plan E.” Deadline March 2021. “Enable more people to switch from car to bus travel.” - “Work with SCC to complete roll out of real time bus passenger information to make bus travel an easier option.” Deadline December 2021.

## **3) Revised Sustainable Design Supplementary Planning Document, EEBC Feb 2016**

The Council is committed to ensuring that Epsom and Ewell grow sustainably and Policy C6 of the adopted Core Strategy requires that “new developments should result in a sustainable environment and reduce or have a neutral impact upon pollution or climate change”.

This document provides details on how planning policy (CS6 in particular) is to be implemented. Proposals need to demonstrate how they meet the principles of CS6 by providing information in the following areas: minimising energy requirements of construction, waste management, air quality, noise and light pollution, managing water (water

consumption, quality and reducing flood risk). This information is to be presented in a “Sustainability Statement”. A brief summary table provided within the document is copied below.

Section in SPD	Requirements for minor <sup>5</sup> or major <sup>6</sup> development proposals
3) Minimising the energy requirements of construction	Applicants will need to demonstrate how energy use will be minimised during the construction process (not how the development itself will perform in energy terms).
4) Waste management	Applicants will need to provide details as to how the proposal performs in relation to construction waste, and where applicable, householder recycling and on-site composting facilities
5) Air quality, noise and light pollution	The Sustainability Statement should identify potential air quality, noise and light pollution issues related to the proposal and set out how they are to be addressed.
<i>Air quality</i>	<i>Major Development:</i> An Air Quality Impact Assessment is required. <i>Minor Development:</i> If development is located within a designated Air Quality Management Area an Air Quality Impact Assessment may be required in support of an application.
<i>Noise</i>	An acoustic study may be required to support an application if the proposal will generate noise with the potential to cause nuisance or harm or if it is located in proximity to such sources of noise.
<i>Light</i>	A report setting out lighting isochrome details may be required if a proposal will generate a significant source of light.

Section in SPD	Requirements for minor or major development
6) Water consumption, quality and reducing flood risk	The Sustainability Statement should provide information on the following categories, where relevant:
<i>Sustainable Drainage Systems (SuDS)</i>	<i>Major Development:</i> Applicants will need to demonstrate how SuDS will be incorporated into the proposal site in perpetuity – such information to be referred to Surrey County Council as the Lead Local Flood Authority. <i>Minor Development:</i> All applicants are required to consider the feasibility of SuDS at the design stage of a scheme. The incorporation of SuDS is required if the development is located within an area of surface water flood risk.
<i>Water quality</i>	<i>Major Development:</i> Applicants will need to demonstrate that the proposal will not create unacceptable pollution risks to water quality or allow existing risks to continue, particularly if located in a Source Protection Zone. <i>Minor Development:</i> If development is located in a Source Protection Zone <sup>7</sup> applicants will need to demonstrate that the proposal will not create unacceptable pollution risks to water or allow existing risks to continue.
<i>Fluvial flood risk</i>	If the site is over 1 hectare in size or located within Flood Zones <sup>8</sup> 2 or 3 a Flood Risk Assessment is Required.
<i>Surface water flooding</i>	If the proposal will increase the built footprint it should be demonstrated that it will not increase the site's risk of or from flooding (e.g. through SuDS).

Of further interest is Chapter 3, summarised below.

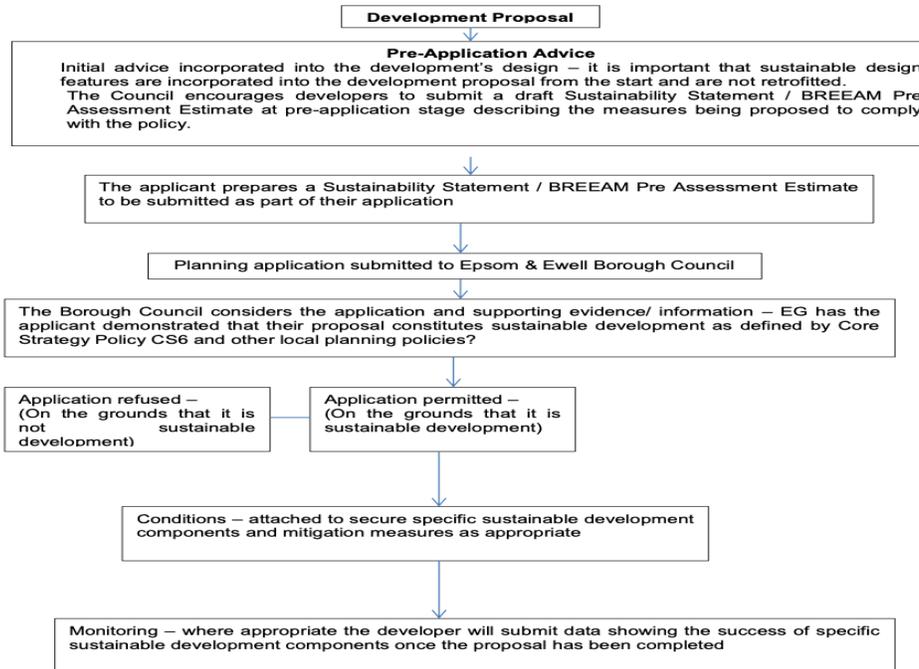
Chapter 3: Minimising energy requirements of construction	<p>Developers shall demonstrate how they have sought to minimise energy within their construction process. This will include details of how embodied energy costs within materials have been reduced. Reference should be made to how recycled, reclaimed, sustainable and locally sourced materials will be used.</p> <p>Where an applicant is unable to demonstrate that they have sought to minimise energy within their development a clear statement setting out the reason why not must be submitted as part of the application. If viability is cited as a reason, a financial open book assessment will be required as supporting evidence.</p>
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It is important to demonstrate compliance with Core Strategy Policy CS6 and to enable the Council to establish whether this proposal constitutes ‘sustainable development’, all minor and major development proposals are required to be accompanied by a Sustainability Statement or appropriate BREEAM Assessment.

In addition, Annexe 1 states that pre-application advice and draft sustainability statement (BREEAM) form part of the pre- assessment application.

**Annex 1 - Sustainable Design and the Development Management Process**

The following flow diagram illustrates how the Council, as local planning authority, will, in conjunction to other key partners<sup>15</sup>, determine how a proposal meets the sustainable development requirements of Core Strategy Policy CS6.



<sup>15</sup> These are comprised of those statutory bodies and other consultees who have a consultative input into the planning development management process.

**Planning Application Documents consulted and associated notes of interest:**

**Drawings General Arrangement Elevation East 12/17/20 and General Arrangement Elevation South 12/17/20. Soft Landscaping Plan 20/02/2021**

*Comments:* Green wall strips (2 on East elevation, 1 on North elevation and one on South Elevation) are unlikely to “offset” carbon from the development as quoted. There is **no information** as to the type of green wall system, irrigation and maintenance requirements. A south facing green wall may require a very intensive irrigation and maintenance arrangement and there is some uncertainty as to the viability of this section in particular.

**Proposed Materials Schedule:**

The proposed development consists of steel structure, concrete decks and galvanised aluminium cladding all highly carbon intensive in their manufacturing and recycling life cycles.

*Comments:* There is very limited information available as to the choice of the materials in terms of their **carbon footprint** and this document does not appear to meet the SCC Climate Change Strategy, Section 1.5 Buildings and Infrastructure SP3. There is no reference to Section 3 of EEBC Sustainable Design Supplementary Planning Document which requires “Developers shall demonstrate how they have sought to minimise energy within their construction process. This will include details of how embodied energy costs within materials have been reduced. Reference should be made to how recycled, reclaimed, sustainable and locally sourced materials will be used.”

Furthermore, there is no reference to Epsom and Ewell Biodiversity and Planning document (albeit perhaps outdated 2012!) which seeks to ensure that the biodiversity is both protected and enhanced when new developments take place. For example, it is now fairly common practice to include bee and swallow bricks within the structure of walls. There could be opportunities to site these in suitable locations within the brick fabric of the proposed development.

### **EGH MSCP- Planning Statement- February 2020.**

*General comment:* It is not clear if this statement covers the required Sustainability Statement or BREEAM Assessment as required by EEBC Sustainable Design Supplementary Planning Document.

Of interest are the following statements:

Sustainability section on page 16 states “on site congestion leads to idling hence car park reduces idling emissions”.

Electric Vehicle Charging points: 7 active and 6 passive charging points will be provided.

*Comments:* **Given the scale and impact of the proposed development the sustainability section is scant.** The idea that building a 527-space multi-storey car park and 104 ground spaces (631) would significantly reduce idling related emissions is tenuous. To note, passive points are points for which the network of cables and power supply necessary are available so that at a future point a socket can be added easily. For a 631-place carpark 7 active charging points or 1.1 % of car parking spaces is very low in particular given County, Council and National car electrification objectives. It is not clear how this provision fits with Annex 1, Section 1.2 of Surrey Climate Change Strategy to “Develop a county-wide Electric Vehicle strategy by 2021 with an ambition to provide a network of town centre/key location charging points. Charging points will span the 12 local authorities and include fast chargers (SP3)”.

### **Travel Plan:**

Section 4.7: Epsom Rail station is approximately 1.1k from the site or 14min walk away (assuming a leisurely walking speed of 80m/min). Epsom Station is very well serviced to major London stations and surrounding areas.

Section 4.10: Accessibility by bus: 13 bus routes serve the A24. Bus stops “include shelters with seating and timetable information” additionally two services serve the southern part of

the site (section 4.11). In addition, there is a staff shuttle which the general public can use between Epsom and Sutton and St Hellier hospital sites (section 4.14).

*Comments:* **The travel plan seems to confirm that the hospital site is remarkably well connected.** There could be opportunities to improve bus services on Sundays. There is data on active travel modes of transport used by employees of the site (not patients). Developing, promoting and improving the existing public transport and perhaps cycle access and storage would be in line with the objectives of SCC Climate Change Strategy – Transport and Air quality (in particular SP2) and EEBC Climate Action Plan (Year 2, Theme 1, Point 3). Furthermore, it could be argued that for patients who do not wish to walk to the hospital, taxis could be used from Epsom Station, with potential financial savings depending on the cost of parking and duration of stay.

### **Conclusion:**

**It does not appear that the MSCP development meets any of the quoted Council, County and National Climate Change related objectives.** Equally there appears to be **little aspiration to provide an innovative design in terms of material choice, on site generation of power, provision of EV charging points.** It is not clear whether a “Sustainability Statement” was provided although it is noted air quality, noise, tree and flood risk assessment were provided. Although there was a response from the Ecology Officer, no ecology survey was seen.

The ECS reconfirm our objection to this application and suggest that a **full design panel review is required** and that the scheme is **wholly unacceptable for its setting.**

Yours Sincerely,

Epsom Civic Society (Aurelie Paoli & Bob Hollis)