

Epsom General Hospital, Dorking Road, Epsom, Surrey, KT18 7EG

| | |
|-------------------------|---|
| Ward: | Woodcote Ward |
| Site: | Epsom General Hospital, Dorking Road, Epsom, Surrey, KT18 7EG |
| Application for: | Erection of a multi storey car park comprising ground plus 5 storeys and 527 car parking spaces, reconfiguration of surface parking to provide 104 car parking spaces and improvement to the access road from Dorking Road |
| Contact Officer: | Ginny Johnson |

1 Plans and Representations

- 1.1 The Council now holds this information electronically. Please click on the following link to access the plans and representations relating to this application via the Council's website, which is provided by way of background information to the report. Please note that the link is current at the time of publication, and will not be updated.

Link: <https://eplanning.epsom-ewell.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=Q5NDX2GYH7100>

2 Summary

- 2.1 The Site at present comprises surface level car parking, with no built form. It forms part of the wider Epsom General Hospital site, which comprises an ad hoc collection of altered buildings, with varying heights and design styles, lacking any coherent masterplan. The Site also falls in close proximity to the Woodcote Conservation Area.
- 2.2 The proposal seeks the construction of a multi-storey car park (MSCP), comprising 527 car parking spaces, the reconfiguration of the existing surface car parking surrounding the proposed structure, providing an additional 104 car parking spaces and improvements to the access road for vehicles and pedestrians, from Dorking Road.
- 2.3 The proposed MSCP would undeniably have a visual presence, but consideration is given to the requirements for this and the associated public benefits, which include:
- Addressing car parking pressures within Epsom General Hospital, by replacing lost car parking spaces and accommodating required car parking spaces, to future proof car parking needs at the hospital
 - Improving pedestrian routes
 - Improving patient and staff experiences.

- 2.4 Officers consider that the principle of a proposed MSCP is acceptable, subject to material considerations. The proposal has evolved to better respond to its surrounding context, but Officers do accept that there is a degree of harm caused to the setting of the adjacent Conservation Area. In balancing this harm against the public benefits of the scheme, the requirements for a parking solution at the hospital and the public benefits arising from the MSCP are in this case, considered to outweigh the adverse impacts of the proposal, when considering paragraph 196 of the NPPF.
- 2.5 Officers recommend approval, subject to a completed S106 Legal Agreement and Conditions.

3 Site description

- 3.1 The Application Site ('Site') comprises car parking spaces. It is broadly triangular in shape, measuring approximately 0.77 hectares in size. It forms part of the Epsom General Hospital wider site.
- 3.2 To the north and east of the Site is Epsom Hockey Club's building and Epsom Cricket's Club's green, to the north-east of the Site are two storey residential properties, lining Dorking Road, to the south of the Site is Epsom Lawn Tennis Club's courts and to the west of the Site is Epsom General Hospital and its various buildings, car parking and hardstanding.
- 3.3 The wider area comprises a mix of uses, including housing and schools. Epsom Town Centre is located approximately 1.3 kilometres to the north of the Site (approximately a 15 minute walk).
- 3.4 Dorking Road is to the north-west of the Site, which provides existing access to the Site.
- 3.5 The Site is designated as a Built Up Area. It is not Listed, nor is it within a Conservation Area, but it is adjacent to Woodcote Conservation Area.
- 3.6 The Site is within Flood Zone 1 (low probability of flooding), but partly within a Critical Drainage Area.
- 3.7 There are no tree preservation orders relating to the Site or relating to trees on its boundaries.

4 Proposal

- 4.1 The proposal seeks:
- the construction of a multi-storey car park (MSCP), comprising 527 car parking spaces
 - the reconfiguration of surface parking surrounding the MSCP, providing 104 car parking spaces; and
 - improvements to the access road for pedestrians and vehicles, from Dorking Road.
- 4.2 In accordance with the accompanying Design and Access Statement (DAS), the proposed MSCP provides a total of 631 spaces, including 27 disabled parking spaces. The Trust intends to split the MSCP car parking between staff, patients and visitors, although the exact operational strategy is still in development. Any division internally will be achieved through signage and management, rather than barriers. Patients and visitors are likely to be allocated to the lower levels, with staff on upper levels.

4.3 In accordance with the DAS, the general arrangement is as follows:

| | Disabled | Non-disabled |
|---------------------|----------|--------------|
| Level 05 | 2 | 88 |
| Level 04 | 2 | 88 |
| Level 03 | 2 | 88 |
| Level 02 | 2 | 88 |
| Level 01 | 2 | 88 |
| Level 00 (ground) | 2 | 75 |
| | 727 | |
| Surface car parking | 15 | 89 |
| | 631 | |

4.4 In accordance with submitted drawings, the proposed MSCP measures approximately 21 metres in height, 70 metres in width and 32 metres in depth. It is set over 6 storeys.

5 Comments from third parties

5.1 The application was advertised by means of letters of notification to 70 neighbouring properties. A Site Notice was displayed and the application advertised in the local paper.

5.2 1 letter of support was initially received, with the following comment:

- Car parking arrangements are inadequate for patients at present

5.3 89 letters of objection were initially received, with the following concerns:

- Inappropriate height and mass
- Inappropriate design
- Adverse impact on neighbouring amenity
- Adverse visual impact
- Adverse impact on adjacent Sports Club
- Traffic generation and impact
- Adverse environmental impact
- Adverse ecological impact

Woodcote Epsom Residents' Society

- Accepts the principle of a multi-storey car park on the Site, to address existing vehicle movement and parking problems and to replace lost car parking
- Inappropriate height and massing
- Inappropriate design
- Adverse impact on neighbouring heritage assets

- Adverse visual impact

The Board (Committee) of Epsom Sports Club

- Inappropriate height and massing
- Inappropriate design
- Overlooking to the club grounds, raising a safeguarding and welfare risk
- Adverse environmental impact
- Traffic generation and impact

Epsom Civic Society

- Recognise requirement for a car park
- Would recommend green living walls
- Inappropriate height and massing
- Adverse impact on adjacent Conservation Area and nearby listed buildings on Dorking Road
- Adverse impact on and from adjacent sports club's ground
- No sustainability credentials
- Public health risks
- Limited charging points for electric vehicles

5.4 Amended plans were received and re-consultation took place on 05.02.2021. 26 letters of objection were received, with the following concerns:

- Inappropriate height and mass
- Inappropriate design
- Adverse impact on adjacent Sports Club and Cricket Club
- Traffic generation and impact
- Adverse environmental impact

Woodcote (Epsom) Residents' Society

- Inappropriate height and mass
- Adverse visual impact
- Inappropriate materials, visually incongruous
- Out of character
- Adverse impact on heritage assets
- Parking requirements
- Limited sustainability credentials

The Board (Committee) of Epsom Sports Club

- Initial objection remains (including previous comments)
- Noise and disturbance

Epsom Civic Society

- Adverse impact on adjacent sports club
- Inappropriate height and mass
- Inappropriate design
- No inclusion of green walls, timber fenestration. Metal cladding is inappropriate
- Basement car park would be welcomes

5.5 Updated drawings were received on 29.03.2021, with design amendments. The new drawings show the following design amendments:

- Reduction in jump height protection by 1 metre. This revised height level does remain within the recommended height limits
- Introducing four living walls on the building (one each on the north and south elevations and two on the eastern elevation)
- Removal of perforated panels on the top floor
- Standardised the colour of all galvanised items.

5.6 The Local Planning Authority has re-consulted on the amended drawings for 14 - 21 days. 23 letters of objection were received, with the following concerns:

- Inappropriate height and mass
- Inappropriate design
- Adverse impact on neighbouring amenity
- Traffic generation and impact
- Adverse environmental impact
- Noise and disturbance.

Woodcote (Epsom) Residents' Society

- Inappropriate height (reduction in decking height is welcomed, but highest part of the building, at cores 1 and 2, remain the same height, with the building being between 4.6 and 5.5 metres higher than the nearest corner of the Bradley Wing hospital building)
- Green walls are more like green strips and fail to break up massing of the building or contribute to sustainability
- Removing perforated panels and standardisation of colour will have a minimal impact on the harmful visual impact.

Epsom Civic Society

- Reduction of the top floor by 1 metres is beneficial, but the new building is 5.6 above the adjacent wing of the hospital
- The green living walls are "2 metre wide strips" and only offer decorative benefits
- The removal of the perforated panels assists the aesthetics, but has minimal effect on the overall façade vision.

6 Consultations

- SCC Highways (25.03.2021): recommend S106 Obligation and conditions
- SCC Fire and Rescue (14.04.2020): the application demonstrated compliance with the Fire Safety Order in respect of means of warning and escape in case of fire
- SCC Archaeology (10.02.2021): recommend condition
- SCC LLFA (05.03.2020): recommend conditions
- Environment Agency: the application has a low environmental risk and so no comments to make
- Thames Water (18.02.2021): recommend condition and informative
- EEBC Ecology: recommend condition

- EEBC Trees: no formal comment provided
- EEBC Environmental Health (15.02.2021): design needs to be properly considered to promote natural surveillance and avoid areas that could be exploited for anti-social behaviour and other illegal activities. There is an adverse noise impact predicted, with mitigation suggested. This should be installed
- EEBC Contaminated Land: (02.03.2020): recommend condition
- EEBC Design and Conservation Area Officer: objection
- Crime Reduction Advisor & Design Out Crime Officer: the MSCP would be a positive move in terms of safe and available car parking.

7 Relevant planning history

- 7.1 There is an extensive planning history relating to Epsom General Hospital. The below details relevant and recent planning applications only. It does not provide a comprehensive list of all planning applications at the wider site.

| Application number | Decision date | Application detail | Decision |
|--------------------|---------------|--|--------------------------------------|
| 21/00252/FUL | Pending | Demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people arranged in two buildings, comprising 267 care residences, 10 care apartments and 28 care suites providing transitional care, together with ancillary communal and support services Use Class C2, 24 key worker units Use Class C3, childrens nursery Use Class E, as well as associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space | Pending |
| 20/01322/DEM | 12.10.2020 | Demolition of the existing buildings and structures on site | Prior Approval Required and Approved |
| 20/01093/DEM | 03.09.2020 | Demolition of the existing buildings and structures on site | Prior Approval Required and Approved |
| 20/00885/DEM | 22.07.2020 | Prior Notification of the proposed demolition of buildings at Epsom General Hospital, including York House, Woodcote Lodge, Rowan House, Beacon Ward, the boiler house and ancillary buildings and structures, under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) | Prior Approval Required and Approved |
| 20/00108/FUL | 30.07.2020 | Part-demolition, construction of a three-storey extension to the rear of Langley Wing, a bridge link between Langley Wing and Wells Wing at second floor level, a roof garden at ground floor level, internal and external alterations of Langley Wing and plant | Granted |
| 19/01722/FUL | 23.11.2020 | Demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people | Refused |

| Application number | Decision date | Application detail | Decision |
|--------------------|---------------|--|----------|
| | | arranged in two buildings, comprising 302 to 308 care residences, 8 to 12 care apartments and 26 to 30 care suites providing transitional care, together with ancillary communal and support services Use Class C2, 24 key worker units Use Class C3, childrens nursery Use Class D1 as well as associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space | |
| 19/00865/FUL | 11.10.2019 | Installation of a new Boiler House, CHP, Standby Generator and associated plant on Well's Wing second floor terrace, with acoustic screen | Granted |
| 19/00295/FUL | 12.08.2019 | Covered walkway, new boundary fence section, relocation of cycle facility, re-provision of VIE oxygen storage facility, double stacking of A&E modular building and paved access route to the North East of Woodcote Wing (Retrospective) | Granted |
| 19/00063/FUL | 19.07.2019 | Two oil tanks, a generator with a flue and a mast structure | Granted |
| 18/01571/FUL | 14.06.2019 | Retrospective 3 storey Modular Office Accommodation Building | Granted |
| 18/00990/FUL | 10.12.2018 | Proposed extension to accommodate new bed lift | Granted |
| 16/00719/FUL | 20.10.2016 | Erection of 2No glass curtain wall link corridors with 5 degree roof. Alterations to existing doors and windows to suite new layout. Landscaping to Fenby Ward, level existing secure garden, lay half with new Astro Turf and creation of play area | Granted |
| 15/00910/FUL | 03.11.2015 | Re-cladding of the "Wells Wing" building, comprising installation of new external wall insulated render system, replacement new double-glazed uPVC/PPC aluminium windows and upgraded roof finish and insulation | Granted |

| Application number | Decision date | Application detail | Decision |
|--------------------|---------------|---|----------|
| 14/00494/FUL | 09.09.2014 | Excavation to external areas of Elgar Ward and Delius Ward to enable the provision of secure fenced outdoor areas together with associated hard and soft landscaping. | Granted |
| 10/00876/FUL | 02.02.2011 | Single-storey extension and alteration to existing endoscopy day-case unit | Granted |

8 Planning Policy

National Policy Planning Framework (NPPF) 2019

Chapter 2 Achieving Sustainable Development

Chapter 4 Decision Making

Chapter 6 Promoting a Strong and Competitive Economy

Chapter 8 Promoting Healthily and safe communities

Chapter 9 Promoting Sustainable Transport

Chapter 11 Making Effective Use of Land

Chapter 12 Achieving Well-Designed Places

Chapter 14 Meeting the Challenge of Climate Change, Flooding and Coastal Change

Chapter 15 Conserving and Enhancing the Natural Environment

Chapter 16 Conserving and Enhancing the Historic Environment

Core Strategy 2007

Policy CS1 – Sustainability

Policy CS3 - Biodiversity

Policy CS5 - The Built Environment

Policy CS6 - Sustainability in New Developments

Policy CS12 - Infrastructure

Policy CS13 - Community facilities

Policy CS16 - Managing transport and travel

Development Management Policies Document November 2015

Policy DM4 - Biodiversity

Policy DM5 - Trees and landscape

Policy DM7 - Footpath, cycle and bridleway network

Policy DM8 - Heritage assets

Policy DM9 - Townscape character and local distinctiveness

Policy DM10 - Design requirements

Policy DM17 – Contaminated land

Policy DM19 - Development and flood risk

Policy DM34 - New social infrastructure

Policy DM35 - Transport and New Development

Policy DM36 - Sustainable transport.

Policy DM37 – Parking Standards

9 Planning considerations

- Principle of development
- Design, heritage and visual impact
- Transport
- Neighbouring Amenity and Noise
- Air Quality
- Trees and Landscaping
- Ecology
- Archaeology
- Flood Risk and Drainage
- Contamination.
- Crime and Community Safety

10 Principle of development

10.1 The main principle considerations include:

- The need for a MSCP; and
- The impact of the MSCP on heritage assets.

MSCP need

- 10.2 A letter, dated 03.02.2020 accompanies this application, which sets out the reasoning for the proposed MSCP. It sets out that that Epsom and St Helier University Hospitals NHS Trust ('The Trust') are part way through a significant investment programme at Epsom General Hospital. At peak times there are queues on Dorking Road, for access to the hospital's public car park. This scheme seeks to address this, by creating new lanes (or "reservoirs") for cars entering and leaving the Site, to reduce pressure on Dorking Road. This also provides swifter access for ambulances.
- 10.3 The letter sets out that alternative methods of travel for staff and patients will be promoted and improvements to public transport access to Epsom General Hospital will be explored. But, to ensure that the existing number of car parking spaces for staff and visitors are retained, it's essential that the MSCP is built.
- 10.4 The letter sets out that the programme of improvements is partly funded by the recent sale of part of the Epsom General Hospital site to Guild Living. As a result of this sale, the amount of surface car parking available to The Trust will reduce and so to ensure that the car parking capacity is retained, this scheme seeks to replace the car parking and accommodate additional car parking, required for impatient and therapy services, which will move from West Park (New Epsom and Ewell Cottage Hospital and The Poplars) (NEECH) to Epsom General Hospital. Additionally, the proposal seeks to re-provide car parking spaces that have been removed as a result of other permitted schemes on the hospital site.
- 10.5 The cover letter makes reference to the 'Guild Living scheme', but Officers note that this was refused on 23.11.2020, under ref: 19/01722/FUL. A revised planning application has been submitted, under ref: 21/00252/FUL.
- 10.6 The accompanying DAS reiterates the contents of the letter, but further sets out that the proposal also seeks a much-improved pedestrian route from the Dorking Road entrance, through to the Wells Wing and Emergency Department entrances on the eastern elevation of the hospital.
- 10.7 An email presentation was received on 07.04.2021 from the Applicant, providing a "social benefits case" for the proposed scheme, which is available in the public domain. The presentation sets out a summary of future options and strategies for Epsom General Hospital, including, for example, proposed refurbishments to existing buildings and proposed investments to expand emergency and urgent care facilities. It sets out the need for the proposed MSCP, stating that approximately 250 car parking spaces has been lost as a result of a sale of land to Guild Living, 50 additional car parking spaces being required for the NEECH move to Epsom General Hospital, to improve patient and staff experience and future proofing the car parking needs for the hospital.
- 10.8 The presentation sets out that concerns had been raised regarding the height of the proposed MSCP, so the Applicant did explore a scheme with a reduced height, but this would require a larger footprint, pushing the proposed building closer to the Site boundary, which in part comprises the boundary of the adjacent Conservation Area..
- 10.9 The presentation does set out that in response to representation received on this application, the following changes have been sought:
- proposing more trees on the Site

- jump height protection has been removed on the top floor of the building;
- perforated panels have been removed;
- galvanised items have been standardised to improve aesthetics;
- alterations to materials; and
- four green living walls have been introduced.

10.10 In considering the case put forward, Officers understand that a car parking solution is required at Epsom General Hospital. The proposed MSCP and surface car parking would replace lost car parking and accommodate future car parking needs. Subject to material considerations, the principle of a MSCP at Epsom General Hospital is considered acceptable.

Impact of MSCP on heritage assets

10.11 At present, the Site comprises surface level car parking, with no built form. It forms part of the wider Epsom General Hospital site, which comprises an ad hoc collection of altered buildings, with varying heights and design styles, lacking any coherent masterplan. The Site also falls in close proximity to the boundary of the Woodcote Conservation Area, which in this location relates to the back gardens of residential properties facing onto Dorking Road. The residential properties referred to are Grade II Listed Buildings but are located further away from the proposed MSCP.

10.12 Officers appreciate the Site's key constraints, the practical consideration that has led to the siting of the proposed MSCP and the required height of this to allow for required car parking numbers. During the course of this planning application, the Applicant has sought to provide reasoning and justification for the proposed MSCP and the recently amended drawings seek to reduce the height of the jump height protector, to decrease the height of the overall building. The introduction of living walls and additional tree planting on the Site boundary has sought to soften the building's appearance and impact. In essence, the Applicant has altered the design of the proposal to further mitigate the adverse impacts on the surrounding context.

10.13 Officers acknowledge that the proposed building would undeniably have a visual presence, but consideration is given to the requirements for the proposed MSCP and the public benefits arising from this, which include:

- Addressing car parking pressures within Epsom General Hospital, by replacing lost car parking spaces and accommodating required car parking spaces, to future proof car parking needs at the hospital
- Improving pedestrian routes
- Improving patient and staff experiences.

10.14 Officers consider that the principle of a proposed MSCP is acceptable, subject to material considerations. The proposal has evolved to better respond to its surrounding context, but Officers do accept that there is a degree of harm caused to the setting of the adjacent Conservation Area. In balancing this harm against the public benefits of the scheme, the requirements for a parking solution at the hospital and the public benefits arising from the MSCP are in this case, considered to outweigh the adverse impacts of the proposal, when considering paragraph 196 of the NPPF.

11 Design, Heritage and Visual Impact

- 11.1 Chapter 16 of the NPPF relates to the conservation and enhancement of the historic environment. Paragraph 189 sets out that in determining applications, Local Planning Authorities should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 11.2 Paragraph 190 sets out that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 11.3 Paragraph 192 sets out that in determining applications, Local Planning Authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - The desirability of new development making a positive contribution to local character, and distinctiveness.
- 11.4 Paragraph 193 sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 11.5 Paragraph 196 sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use
- 11.6 Chapter 12 of the NPPF relates to achieving well-designed places. Paragraph 124 sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this

- 11.7 Paragraph 127 sets out that planning decisions should ensure that developments (inter alia) function well and add to the overall quality of the area, not just for the short term, but over the lifetime of the development. Developments should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Development should be sympathetic to local character and history, including the surrounding built environmental and landscape setting, establish or maintain a strong sense of place and optimise the potential of a Site to accommodate and sustain an appropriate amount and mix of development. Furthermore, places should be created that are safe, inclusive and accessible, with a high standard of amenity for existing and future users.
- 11.8 Paragraph 128 sets out that design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the Local Planning Authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests.
- 11.9 Paragraph 130 sets out that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.
- 11.10 Paragraph 131 sets out that in determining applications, great weight should be given to outstanding or innovative designs, which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 11.11 Policy CS5 sets out that the Local Planning Authority will protect and seek to enhance the Borough's heritage assets including historic buildings and conservation areas. The settings of these assets will be protected and enhanced. The policy also sets out that high quality and inclusive design will be required for all developments. Developments should (inter alia) create attractive, functional and safe environments, reinforce local distinctiveness and complement the attractive characteristics of the Borough and make efficient use of land.
- 11.12 Policy DM8 sets out that the Local Planning Authority will resist the loss of Heritage Assets and every opportunity to conserve and enhance these should be taken by new development.
- 11.13 Policy DM9 sets out that planning permission will be granted for proposals that make a positive contribution to the Borough's visual character and appearance. In assessing this, the following is considered:
- 11.14 compatibility with local character and the relationship to the existing townscape and wider landscape;
- the surrounding historic and natural environment;
 - the setting of the proposal Site and its connection to its surroundings; and
 - the inclusion of locally distinctive features and use of appropriate materials.
- 11.15 The Chalk Lane Conservation Area and the Woodcote Conservation Area fall to the southeast and northeast of the Site (less than 0.1 miles from the Site).

- 11.16 Both the Chalk Lane Conservation Area Appraisal and the Woodcote Conservation Area Appraisal sets out that *"in future, in order that the special architectural and historic interest of the conservation area is protected, the Borough Council will need to be especially vigilant when considering applications for new development"*.
- 11.17 Concerns have been received from neighbours regarding the height, design and massing of the proposal and its impact on surrounding heritage assets. This has been taken into consideration by Officers in the assessment of this application.

Heritage Desk-Based Assessment

- 11.18 A Heritage Desk-Based Assessment, dated February 2020, accompanies this application.
- 11.19 A Design and Access Statement (DAS) accompanies this application, dated 07.02.2020, providing the design rationale for the proposed MSCP. With regards to the Woodcote and Chalk Lane Conservation Areas and the Grade II Listed Buildings along Dorking Road (including White Horse Public House and the 67 and 69 Dorking Road), the assessment sets out that the proposed redevelopment would introduce a degree of change in the setting, through the introduction of new built form. However, the key contributors to the significance of these assets would be preserved, and this change needs to be considered given to the existing urban settings of these assets. As such, the impact of the proposal on the Listed Buildings and Conservation Areas would be limited, due to the existing modern context in which the assets are experienced and the design treatments that aim to respond to the local materials and palette. When all aspects are considered, the proposed development would result in some limited harm to those designated heritage assets, falling within the lower end of the spectrum of less than substantial harm. In accordance with the NPPF, when less than substantial harm (lower end) to designated heritage assets has been identified, *"this harm should be weighed against the public benefits of the proposal"* (Para. 196).

Constraints and opportunities

- 11.20 The DAS sets out that the Site's key constraints include the shared approach lane and minimal reservoir within the Site. The Site is also overlooked from most directions, particularly from the cricket club to the east. The northern end of the Site borders a private residential garden. The key opportunities include the Site's proximity to key hospital entrances and the opportunity to provide an improved pedestrian experience. As part of the proposal, existing pavements would be improved and pedestrian crossings proposed, which would improve wayfinding and safety.

MSCP positioning

- 11.21 The DAS sets out that consideration has been given to the siting of the proposed MSCP, which is broken down into the following four steps:

| | |
|--------|---|
| Step 1 | The footprint of the MSCP is pushed away from sensitive boundaries, positioned closer to the hospital. This gives easier access to and from the hospital for pedestrians and intrudes less onto neighbouring residential properties/sports premises |
| Step 2 | The positioning of the MSCP enables a “reservoir” for cars entering/exiting the hospital, to move away from blue light route. This helps to mitigate congestion along an important access road |
| Step 3 | MSCP cores are positioned to ease pedestrian access to the hospital, whilst protecting the blue light route. Remaining surface parking layout is revised, providing a simpler layout with less confusion. |
| Step 4 | The MSCP employs a Vehicular Circulation Module (VCM) to maximise spatial efficiency of the building, whilst ensuring the built volume is as compact as possible. |

Vertical Circulation Module

- 11.22 In order to provide maximum spatial efficiency and a high quality user experience, the proposed layout of the proposed MSCP is based on a Vertical Circulation Module (VCM). This creates two one-way circulating routes through the car park. The aisles are one way, with a shared central ramp, split using a painted line, in order to improve ease of use for drivers and to maintain the free flow of vehicles. This provides good visibility and clarity of navigation for vehicles and pedestrians.
- 11.23 Car parking spaces are sized at 2.4m x 4.8 m and clear heights at a minimum of 2.1, below any obstruction (e.g. steel beams or signage). Disabled car parking bays have an additional margin of 1.2m to each side and the rear of each space and are located on flat areas only.

Updated drawings (29.03.2021)

- 11.24 Updated drawings were received on 29.03.2021, with design amendments. The new plans seek the following design amendments:
- Reduction in jump height protection by 1 metre. This revised height level does remain within the recommended height limits
 - Introducing four living walls on the building (one each on the north and south elevations and two on the eastern elevation)
 - Removal of perforated panels on the top floor
 - Standardised the colour of all galvanised items.
- 11.25 The materials key on the updated drawings show the following proposed materials:
- Red multi brick
 - Powder coated aluminium fins in four colours (green RAL 6025, Grey RAL 7047, copper RAL 3016 and red RAL 3001)
 - Steel doors
 - Aluminium windows
 - Precast concrete (smooth finish)
 - Galvanised steel structure

- Green wall (subject to fire engineering and building control approval).

11.26 The Local Planning Authority has re-consulted on the amended drawings. Concerns have been raised from nearby residents, regarding the amended scheme, including its height, mass, bulk and design. These comments have been taken into consideration by Officers.

Fire safety

11.27 A formal response was received from Surrey Fire & Rescue Service on 14.04.2020. This sets out that the application has been examined by a Fire Safety Inspecting Officer and it appears to demonstrate compliance with the Fire Safety Order in respect of means of warning and escape in case of fire.

Local Planning Authority Design and Conservation Officer comments (09.03.2021)

11.28 The Local Planning Authority's Design and Conservation Officer commented on this application on 09.03.2021, regarding the originally submitted drawings. The comments are summarised below.

11.29 The proposed MSCP would be located in close proximity to a group of Twentieth Century hospital buildings, which are of limited architectural or historic interest. The proposed MSCP would however be within the setting of the Woodcote Conservation Area. On the northern side of Dorking Road, opposite the entrance to the hospital, there are a small group of one and two storey Grade II Listed buildings. At present, the Site is not built on and is used for ground level parking.

11.30 The proposed MSCP would be clearly visible, given its substantial mass, behind two-storey suburban housing. Its scale, character and materiality would relate in no way to these buildings and given its location next to the Woodcote Conservation Area, it can be regarded as harmful to the setting of this designated heritage asset.

11.31 The scale of the proposed MSCP remains excessive. This is described as a 6 storey building, however this is deceptive, as the top floor is not simply a roof, but a floor with enclosing walls, making it effectively a 7 storey building. This should be regarded as excessive, so close to a Conservation Area of mostly suburban character. The proposal is as excessive as that presented at pre-application stage and is (in my view) unacceptable.

11.32 Views from the Chalk Lane Conservation Area may also be affected by such a large proposed development. The development may not be seen from the Chalk Lane Conservation Area, but the Applicant has not demonstrated this, by not preparing longer views.

11.33 The design of the proposed MSCP is dependent on the articulation of the cladding surfaces, to massage its bulk. This is partially successful, but it does not conceal the sheer scale of the building and its dynamic texturing of surfacing, drawing attention to the building, making it more noticeable from the Conservation Area.

11.34 Though the elevations may have some strong architectural interest, this would mainly be as a result of different colours and forming of metal shapes in the cladding. That interest is very out of character with the architecture of the Conservation Area. Its more dynamic surface articulation would serve to dominate the small scale suburban architecture in the Conservation Area. The exact material finish is so critical to the appearance of the building it is perhaps not something that could be left to conditions.

- 11.35 On balance, the proposal is considered unacceptable and the Applicant is advised to reconsider the scale of the building and reduce its height. However, a much larger footprint, with a slightly reduced height, might also be harmful to the setting of the local context. The proposal is considered to be unacceptable, under Policy DM10, as its scale, layout, height, form (including roof forms) and massing does not respect local character and local distinctiveness. The proposal would also be harmful to the setting of the Conservation Area, contrary to paragraph 190 of the NPPF.

Local Planning Authority Design and Conservation Officer comments (21.04.2021)

- 11.36 The Local Planning Authority's Design and Conservation Officer commented on the updated, latest drawings, on 21.04.2021. The Officer acknowledged that there are some minor amendments to the drawings, but very little has changed. The most obvious change is the addition of four strips of green wall, which adds to the variety of surfaces and some additional interest. However, the Officer is not convinced that the living walls will help to blend the structure into the local environment, when viewed from the Conservation Area, as claimed by the list of amendments. With or without the green walls, the relationship to the architectural character and scale is not related to the Conservation Area or to the hospital.

- 11.37 The reduction of the height by 1 metre is not great within the context of the building and the amendments to the panelling are not clear on the building. Therefore, the principle objection on grounds of scale and impact on the Conservation Area still stand.

Officer comments

- 11.38 At present, the Site comprises surface level car parking, with no built form. It forms part of the wider Epsom General Hospital site, which comprises an ad hoc collection of altered buildings, with varying heights and design styles, lacking any coherent masterplan. The Site also falls in close proximity to the Woodcote Conservation Area and Listed Buildings on Dorking Road.
- 11.39 Officers appreciate the Site's key constraints, the practical consideration that has led to the siting of the proposed MSCP and the required height of this to allow for required car parking numbers. During the course of this planning application, the Applicant has sought to provide reasoning and justification for the proposed MSCP and the recently amended drawings seek to reduce the height of the jump height protector, to decrease the height of the overall building. The introduction of living walls and additional tree planting on the Site boundary has sought to soften the building's appearance and impact.
- 11.40 Officers acknowledge that the proposed building would undeniably have a visual presence, but consideration is given to the requirements for the proposed MSCP and the public benefits arising from this, which include:
- Addressing car parking pressures within Epsom General Hospital, by replacing lost car parking spaces and accommodating required car parking spaces, to future proof car parking needs at the hospital
 - Improving pedestrian routes
 - Improving patient and staff experiences

- 11.41 Officers consider that the principle of a proposed MSCP is acceptable, subject to material considerations. The proposal has evolved to better respond to its surrounding context, but Officers do accept that there is a degree of harm caused to the setting of the adjacent Conservation Area. In balancing this harm against the public benefits of the scheme, the requirements for a parking solution at the hospital and the public benefits arising from the MSCP are in this case, considered to outweigh the adverse impacts of the proposal, when considering paragraph 196 of the NPPF.

12 Transport

- 12.1 Chapter 9 of the NPPF relates to the promotion of sustainable transport.
- 12.2 Paragraph 109 of the NPPF sets out that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 12.3 Policy CS16 encourages development proposals that foster an improved and integrated transport network and facilitate a shift of emphasis to non-car modes as a means of access to services and facilities. Development proposals should (inter alia) provide safe, convenient and attractive accesses for all, including the elderly, disabled, and others with restricted mobility. Development proposals should be appropriate for the highways network in terms of the volume and nature of traffic generated, provide appropriate and effective parking provision, both on and off-site, and vehicular servicing arrangements. Furthermore, development proposals must ensure that vehicular traffic generated does not create new, or exacerbate existing, on street parking problems, not materially increase other traffic problems.
- 12.4 Policy DM36 out that to secure sustainable transport patterns across the Borough, the Local Planning Authority will (inter alia) prioritise the access needs of pedestrians and cyclists in the design of new developments and require new development to provide on-site facilities for cyclists as appropriate, including showers, lockers and secure, convenient cycle parking, in accordance with standards.
- 12.5 Policy DM37 sets out that developments will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions.
- 12.6 Concerns have been received from neighbours regarding the generation of additional traffic and the impact of the development on the surrounding highway. This has been taken into consideration by Officers in the assessment of this application.

Transport Assessment

- 12.7 A Transport Statement dated February 2020, accompanies this application. This was updated in July 2020, following comments from SCC Highways.

Existing parking provision

- 12.8 The Transport Statement sets out that information provided by the Trust states that there are 801 car parking spaces at Epsom General Hospital, divided between staff and visitors. The breakdown of car parking spaces is as follows:

| | |
|--------------------------|-----|
| Visitor spaces | 254 |
| Disabled spaces | 40 |
| Staff spaces | 507 |
| Total car parking spaces | 801 |

Useable spaces

- 12.9 The Transport Statement sets out that the number of space recorded on site as part of surveys undertaken in May 2019 were slightly below that recorded in the above table. Most car parking spaces were lost due to the installation of a modular office building. The resulting observed car parking spaces were as follows:

| | |
|--------------------------|-----|
| Visitor spaces | 248 |
| Staff spaces | 528 |
| Total car parking spaces | 776 |

Visitor car parking

- 12.10 The Transport Statement sets out that the visitor car is located to the left of the main access road from Dorking Road.

General accessibility

- 12.11 The Transport Statement sets out that Epsom General Hospital is in an accessible location and can be accessed by modes of transport other than the private car.

Proposal

- 12.12 The Transport Statement sets out that Epsom General Hospital's site-wide parking capacity, carried out in 2017, has been used as a baseline parking position. In 2017 there were a total of 801 parking spaces across the hospital site, with 256 located within the visitor car park.
- 12.13 The Epsom General Hospital site has undergone numerous changes within the years and in accordance with surveys undertaken in May 2019, there are currently a total of 776 useable parking spaces within the wider hospital site, including 248 spaces in the visitor car park.

Car parking requirements

- 12.14 The Transport Statement sets out that 241 car parking spaces would be lost as a result of redevelopment of an area to the south-west of the Epsom General Hospital site. Additionally, further car parking spaces would have been lost as a result of the following:

| Reference | Description of development | Decision | Decision date | No. of car parking spaces lost |
|--------------|--|----------|---------------|--------------------------------|
| 18/01571/FUL | Retrospective 3 storey Modular Office Accommodation Building | Granted | 14.06.2019 | 12 |
| 19/00063/FUL | Two oil tanks, a generator with a flue and a mast structure | Granted | 19.07.2019 | 23 |

- 12.15 The Transport Statement sets out that additionally, 66 car parking spaces associated with Woodcote Lodge are required to be relocated and existing NHS services, located at New Epsom and Ewell Community Hospital (NEECH), are to be relocated to Epsom General Hospital, resulting in 46 additional staff and demand for approximately 50 extra car parking spaces.
- 12.16 The Transport Statement sets out that as a result of the above, there is a requirement for 851 car parking spaces across the Epsom General Hospital site, which is an increase of 50 car parking spaces above the baseline position.
- 12.17 The development proposals seek to provide a total of 631 parking spaces within the proposed MSCP site boundary/existing visitor car park, with 527 located within the proposed MSCP and a further 104 surface level spaces, all accessed via the existing priority junction on Dorking Road. A further 220 spaces would be retained elsewhere on the Epsom General Hospital site resulting in the total parking capacity of 851 spaces.

Proposed MSCP

- 12.18 The Transport Assessment sets out that the proposed MSCP has been designed on the standard of:
- 2.4m x 4.8m non-disabled car parking bays; and
 - 3.6m x 4.8m disabled car parking bays.
- 12.19 The aisle width is 6m, allowing for a 1.2m pedestrian walkway across the car parking deck. The car parking deck is a Vertical Circulation Module (VCM), meaning that the car parking aisles form part of the ramps of the proposed MSCP. The cross falls are 1:50 and the falls along the aisles are 1:26.

- 12.20 The Transport Assessment sets out that proposed entrance to the car park and the entrance and exit barriers are located in roughly the same position as that in the existing car park, but the area in-between has been redesigned, so that all surface level car parking in this area is removed, to provide two entry and exit lanes.

Disabled spaces

- 12.21 A query has been raised regarding why disabled bays are not located in one area, on one floor of the proposed MSCP.
- 12.22 The Applicant's transport consultant responded to this query, on 27.04.2021, setting out that building regulations and industry standard documents require all accessible parking bays to be placed on a flat/level surface. The proposed MSCP deck layout includes ramped decks, in an arrangement known as Vertical Circulation Module (VCM). Due to this, it is not possible to have all accessible spaces at ground floor level because these would be positioned on a slope.
- 12.23 The proposed accessible spaces have been positioned in close proximity to the stair cores and lifts. Some floors would be used for staff car parking and other floors used for patient and visitors parking, so in line with the Trust's strategy, the proposal would enable accessible parking to be available to all users of the car park.

Car parking management during construction

- 12.24 The Transport Assessment sets out that during the construction of the proposed MSCP, a total of 174 spaces will be retained on Site for use by hospital staff. This area will only be accessible from and to Dorking Road. The remaining staff vehicles will be accommodated off-site at a number of locations with shuttle buses taking staff to/from Epsom General Hospital.
- 12.25 The Transport Assessment sets out that visitors would use the parking spaces within the area for disposal, with access from Woodcote Green Road, with exiting onto Dorking Road. There are 221 spaces proposed within the area for disposal, plus an additional 28 disabled spaces located in the consultant's car park in front of the Woodcote Wing resulting in 249 which is roughly equivalent to the existing visitor car park (256 spaces in 2017).
- 12.26 Figures were updated during the course of the planning application. The correct numbers are 67 staff parking spaces and 132 visitor parking spaces to be provided on Site during construction, whereas previously it was indicated that during construction 174 staff and 249 visitor spaces would be provided on Site.

Construction traffic

- 12.27 The Transport Assessment acknowledges that a separate 'Traffic Management Plan' dated 22.11.2019 accompanies this application. Construction working hours are anticipated to be 08:00 – 18:00 Monday to Friday and 08:00 – 13:00 on Saturdays. There shall be no works on Sundays (unless by prior agreement with Epsom General Hospital).
- 12.28 The preference shall be for operatives to cycle and/or take public transport to the Site. Cycle hoops shall be provided beside the Site officers, to promote cycling to work. There shall be no car parking within Epsom General Hospital, apart from short-term car parking within the construction site boundary, for deliveries and collections.

Post development trips and car parking demand

12.29 Subject to the proposed MSCP being granted planning permission, the Transport Assessment sets out that the hospital arrivals and departures from Dorking Road would consist of:

- existing trips (Table 5.1 of the Transport Assessment)
- trips from Woodcote Green Road (Table 5.12 of the Transport Assessment); and
- NEECH trips (Table 5.13 of the Transport Assessment).

- 12.30 The resulting peak hour arrivals and departures, along with net changes, are shown below:

| | Arrival | Departure | Total | Change |
|-------------------------------|---------|-----------|-------|--------|
| AM peak (07:30 – 08:30) | 301 | 153 | 454 | +106 |
| PM peak (16 | 122 | 313 | 435 | +108 |

- 12.31 The Transport Assessment sets out that the existing parking accumulation data for both the visitor car park and the wider Epsom General Hospital site (Figures 5.2 and 5.3) demonstrate that the existing car park reaches full capacity (or close to full capacity). Additionally, the relocation of staff/services from NEECH would result in an increase in demand for on-site car parking, of 50 spaces.
- 12.32 The Transport Assessment therefore considers that the proposed increase in car parking, as a result of the proposed MSCP (from 801 to 851 total spaces) is appropriate to accommodate the additional demand from NEECH.

Traffic impact

- 12.33 The Transport Assessment sets out that the proposed MSCP is not predicted to have a significant impact on traffic on Dorking Road. Whilst there will be an increase in vehicles queuing to exit the proposed MSCP, the number is not considered to be unusual for a car park of this size during the peak hour. The route to and from the entry/exit barriers has been designed to accommodate queuing traffic away from other hospital traffic (such as ambulances).

Summary

- 12.34 In summary, the Transport Assessment sets out that the proposal seeks to provide 527 car parking spaces within the proposed MSCP and an additional 104 surface level car parking spaces. With a further 220 car parking spaces being retained elsewhere on the Epsom General Hospital site, the total car parking spaces increases from 801 to 851 car parking spaces.
- 12.35 The Transport Assessment sets out that Epsom General Hospital is located in an accessible location and can be accessed by different modes of transport.
- 12.36 The Transport Assessment sets out that due to the reassignment of trips currently accessing Epsom General Hospital's car park within the area for disposal from Woodcote Green Road, plus the relocation of staff/services from NEECH to Epsom General Hospital, there will be an increase in trips as result of the proposals.
- 12.37 Junction capacity assessment demonstrate that Dorking Road/Epsom General Hospital's access would operate with a minimal impact on Dorking Road, following the implementation of the proposed MSCP, whilst the increase in queuing within the Epsom General Site could be accommodated by the proposed layout.

- 12.38 The Transport Assessment sets out that the proposed car parking provision is appropriate to accommodate the additional demand from NEECH, whilst also providing an extra amount of car parking spaces, to prevent overspill onto surrounding residential roads.
- 12.39 The Transport Assessment concludes that the proposed MSCP would not have a material traffic impact or a detrimental impact on local highway safety. Therefore, it is considered that there are no highway or transport reasons that would support refusal of the planning application.

Travel Plan

- 12.40 A Travel Plan, dated February 2020, accompanies this application. An updated Travel Plan was provided on July 2020, as a result from SCC Highways' formal consultation response.
- 12.41 It provides a long-term strategy with the aim of promoting and facilitating trips to and from the Site using the most sustainable modes of travel available and in turn, reducing private car travel and associated car parking demand. The primary objective of the Travel Plan is to reduce unnecessary vehicular trips undertaken by staff and visitors through the promotion and facilitation of suitable alternative modes of travel when accessing the Site.
- 12.42 The Travel Plan sets out a range of physical and managerial measures to implement the long-term strategy. It is not a fixed document and the strategy and measures may require reviewing over the period of the Plan, to accommodate any changes in circumstances. Notwithstanding this, the objectives of the Travel Plan to encourage sustainable travel will not change.
- 12.43 SCC Highways raised concern with the updated Travel Plan, specifically that there was not enough content to make it acceptable. SCC Highways recommended that a new Travel Plan is secured by condition, should planning permission be granted.

SCC Highways

- 12.44 SCC Highways requested the models used in the Transport Assessment, for review by SCC Highways Modelling team. In addition, SCC Highways provided a formal response, dated 06 May 2020, requiring additional information from the Applicant.
- 12.45 The Applicant provided a Technical Note and updated Transport Assessment and Travel Plan on 24.07.2020 to address concerns raised by SCC Highways.
- 12.46 SCC Highways raised additional concerns with regards to the temporary reduction in car parking spaces at the Epsom General Hospital site. SCC Highways also queried whether there would be any changes to the main hospital access on Dorking Road. The Applicant's transport consultant confirmed in an email, dated 14.10.2020, that there are no current plans to make alterations to the main hospital access on Dorking Road.
- 12.47 A note was prepared by the Applicant's transport consultant, on 11.12.2020, comparing the existing/observed arrivals and departures at the Epsom General Hospital site, with those predicted to take place during the construction phase of the MSCP. SCC Highways responded on 06.01.2021, requiring additional information from the Applicant.
- 12.48 SCC Highways Modelling team's concerns regarded the impact of trips on Dorking Road. The Applicant sought to address this and dialog was had between SCC Highways and the Applicant's Transport Consultant regarding suitable mitigation for increased queuing at Epsom General Hospital.

- 12.49 SCC Highways confirmed on 12.02.2021 that it is content that a Temporary Visitor Car Park Management Plan could be secured by planning condition, subject to planning permission being granted.
- 12.50 SCC Highways provided a final response, dated 25.03.2021, recommending that an appropriate agreement should be secured, before the grant of planning permission. The response comprises Obligations and Conditions and also an extensive 'Note to Case Officer'. This is provided below.

"This application seeks planning permission for the erection of a MSCP and the reconfiguration of some of the existing car parking within the Application Site at Epsom General Hospital. It is proposed 527 car parking spaces will be provided within the MSCP and that the reconfiguration of existing at grade car parking within the red line edging of the Application Site will provide 104 car parking spaces. The number of car parking spaces within the Epsom General Hospital site (including those 220 spaces retained elsewhere on the hospital site, outside of the red line edging) would total 851 parking spaces.

Parking surveys were carried out at the site in 2017, to determine a baseline position for parking at Epsom General Hospital prior to the redevelopment works. These surveys confirmed that there were 801 parking spaces available at Epsom General Hospital (254 visitor parking spaces, 40 disabled parking spaces and 507 staff car parking spaces). The proposal for 851 car parking spaces is therefore a net increase of only 50 car parking spaces at the hospital site.

The need for a MSCP largely results from the sale of part of the Epsom General Hospital site fronting Woodcote Green Road to a third party. The land sold comprises areas previously used for staff car parking and redundant hospital buildings. Owing to the sale of this land, Epsom General Hospital has lost 241 parking spaces. To re-provide these car parking spaces the Applicant proposes to build a MSCP. The demand for a net additional 50 car parking spaces within the Epsom General Hospital results from the relocation of NHS services currently provided at the New Epsom and Ewell Community Hospital (NEECH) which are to be relocated to the Epsom General Hospital site. The relocation of this service will see 46 additional staff based at Epsom General Hospital and therefore justify demand for 50 additional car parking spaces within the Site.

The County Highway Authority highlights that this application would therefore only increase the numbers of parking spaces at Epsom General Hospital by 50. The proposed MSCP condenses the area within which these spaces are provided as the hospital has already sold land used for hospital parking to a third party. An existing point of access on Woodcote Green Road that does not fall within the land sold to the third party will be retained and be used as a servicing route for the hospital, and shall be subject to a one-way (south to north) operation.

It is proposed that vehicles accessing the MSCP will use the existing eastern most access on Dorking Road (A24). It is understood that prior to the sale of part of the Epsom General Hospital site, most staff accessed Epsom General Hospital via the Woodcote Green Road entrance. The proposed development would therefore see intensification in use of the Dorking Road entrance to Epsom General Hospital as existing trips, relocated trips from Woodcote Green Road and new trips associated with the relocated services from the NEECH would all be accessing on-site car parking using this access. The Applicant has provided the figures for the below table, which details the number of arrivals and departures and net change in vehicle movements in the AM and PM peak hour. The majority of these are not new trips on the network, but are redistributed trips all accessing

the site via Dorking Road, whereas previously, the trips would have been split between Dorking Road and Woodcote Green Road.

| | <i>Arrival</i> | <i>Departure</i> | <i>Total</i> | <i>Change</i> |
|--|----------------|------------------|--------------|---------------|
| <i>AM peak (07:30 – 08:30)</i> | <i>301</i> | <i>153</i> | <i>454</i> | <i>+106</i> |
| <i>PM peak (16</i> | <i>122</i> | <i>313</i> | <i>435</i> | <i>+108</i> |

The County Highway Authority has raised concern about the impact of additional traffic using the existing Epsom General Hospital access on Dorking Road. The Applicant has carried out Paramics Modelling to assess the impact of both reassigned trips from Woodcote Green Road and additional trips associated with the proposed development. The modelling has passed audits carried out by SCC Highways Modelling team.

The modelling report provided by the Applicant acknowledges that there are unreleased vehicles within Epsom General Hospital and that there will be a significant increase in queuing levels in the hospital exits between base and 2025 scenarios. Left unmitigated in a worst-case scenario, the greatest number of unreleased vehicles from the hospital access is 137 in the 2025 plus development scenario. The unreleased vehicles are vehicles trying to get onto the network, but because of queuing, are unable to join the network. Because these are not in the model, it is hard to quantify these, but this could be interpreted as vehicles that need to be released, and therefore this can be thought of as an additional queue of vehicles waiting to leave the site.

To address these concerns the Applicant has modelled preventing those vehicles that would be turning left when leaving the site from using the main Epsom General Hospital exit, and reassigning all left turning traffic to the existing egress only junction further west onto Dorking Road. This mitigation reduces the level of queuing at the main junction, however, does not entirely remove queuing within the Application Site. The below summary table provided by the Applicant sets out the mitigation impact of redirecting left turning vehicles exiting the site to the westernmost egress. It should be noted that a queue length of 0 does not mean there is no queuing, but instead that any queuing is within the extents of the model, which allows for approximately 12 vehicles at the main junction and approximately 10 at the egress.

| Main Junction | No Mitigation | Mitigation |
|---------------|---------------|--------------|
| Base | 0 | NA |
| Base + Dev | 90, PM, 1715 | 50, PM, 1715 |
| 2025 | 20, PM, 1630 | NA |
| 2025 + Dev | 125, PM, 1715 | 70, PM, 1715 |

| Egress only | No Mitigation | Mitigation |
|-------------|---------------|-------------|
| Base | 0 | NA |
| Base + Dev | 0 | 0 |
| 2025 | 10, AM, 945 | NA |
| 2025 + Dev | 10, AM, 945 | 30, AM, 945 |

The mitigation (redistribution of left turning vehicles from the main hospital junction to the egress only junction to the west) does reduce the number of unreleased vehicles from the main Epsom General Hospital junction in the 2025 plus development scenario. However, the proposed mitigation does increase the number of unreleased vehicles travelling north bound on Dorking Road at certain times of the day, for example increasing from 220 in the unmitigated scenario to 250 in the mitigated scenario at 18:15 (please see table below which demonstrates worst case number of unreleased vehicles on Dorking Road). As the below table highlights, in the worst case scenario, the proposed development could increase the number of unreleased vehicles on Dorking Road from 150 (2025 without any development) to 250 (2025 with development and mitigation to

reduce extent of queuing within the site). The PM period sees the highest growth in unreleased vehicles and the audits suggest this occurs around 18:00 (+/- 15 minutes).

| | AM Unreleased Vehicles | IP Unreleased Vehicles | PM Unreleased Vehicles |
|------------|------------------------|------------------------|------------------------|
| 2025 Base | 130 | 20 | 150 |
| 2025 + dev | 100 | 15 | 220 |
| 2025 + mit | 100 | - | 250 |

Increases in the +mitigation scenarios could be due to both variability within the model and 'letting out behaviour' on the main carriageway. A more constant stream of right turners from the main Epsom General Hospital exit may be slowing traffic on the main carriageway slightly. However, this is considered the worst-case scenario, which is unlikely to be reached

The Applicant has confirmed that to further reduce queuing within the Application Site and reduce the impact on Dorking Road, they will stagger staff shift patterns, to be tied into the Travel Plan. This will spread staff departure times from the hospital across several hours and further reduce the extent of queuing within the Application Site. The modelling does not account for this and is hence a worst-case scenario. The Applicant has also advised that they will continue to provide approximately 25% of outpatient appointments virtually after the COVID-19 pandemic, so in-person outpatient appointments at the hospital will be reduced further, reducing queuing within the Application Site, which again has not been modelled. The modelled scenario is therefore a worst-case situation, and, the impact of the development is likely to be less than the modelling predicts. The County Highway Authority understands the Applicant may be considering reducing the amount of parking provided within the proposed MSCP. Should this be the case the impact would be further reduced.

On balance the County Highway Authority does not consider that the impact of the proposed development on Dorking Road would be severe if the above mitigation measures are secured, with the proposed mitigation (redirecting left turning vehicles to the egress, staggering staff shift patterns and providing 25% of appointments virtually) combined with a Travel Plan (a strategy for reducing car travel to the Application Site, and measures for implementing the strategy) will suitably reduce the impact of the proposed development on the highway.

As Epsom General Hospital have already sold the land used for staff car parking to a third party, the Applicant has confirmed it will not be possible to use this area for parking whilst the proposed MSCP is under construction. Additional parking will be temporarily lost within the red line edging of the Application Site whilst the proposed car park is under construction. It is therefore important that both staff and visitor car parking is carefully managed during construction to ensure that demand for parking within the Application Site does not exceed the reduced parking capacity. The County Highway Authority recommends a condition for a Visitor Temporary Parking Management Plan.

With regards to Temporary Staff parking, the Applicant has agreed with Epsom & Ewell Borough Council at the October 2020 Environment and Safe Communities Committee that Epsom & Ewell Borough Council can provide 450 car parking spaces to Epsom General Hospital Staff on a temporary basis whilst the proposed MSCP is under

construction within existing Borough Council car parks, however the County Highway Authority was not involved in this committee or agreement.

The County Highway Authority also recommends a permanent car parking management plan be provided, which should address the management and allocation of staff and visitor car parking at the site on a permanent basis.

Officer comments

- 12.51 The proposal seeks a MSCP, which has been assessed by SCC Highways, who have no objection, subject to S106 Obligations and Conditions. Officers are satisfied that the proposal meets the relevant policy tests.

13 Neighbouring Amenity and Noise

- 13.1 Policy DM9 (Townscape Character and Local Distinctiveness) sets out that Planning Permission will be granted for proposals which make a positive contribution to the Borough's visual character and appearance. In assessing this, the following will be considered:
- compatibility with local character and the relationship to the existing townscape and wider landscape;
 - the surrounding historic and natural environment;
 - the setting of the proposal site and its connection to its surroundings; and the inclusion of locally distinctive features and use of appropriate materials.
- 13.2 Policy DM10 sets out that development proposals will be required to incorporate principles of good design. The most essential elements identified as contributing to the character and local distinctiveness of a street or area which should be respected, maintained or enhanced include, but are not limited, to the following:
- prevailing development typology, including housing types and sizes;
 - prevailing density of the surrounding area;
 - scale, layout, height, form (including roof forms), massing;
 - plot width and format which includes spaces between buildings;
 - building line; and
 - typical details and key features such as roof forms, window format, building materials and design detailing of elevations, existence of grass verges etc.
- 13.3 Concerns have been received from residents that the proposed buildings will adversely impact neighbouring amenity enjoyed at properties surrounding the Site. This has been taken into consideration by Officers in the assessment of this application.
- 13.4 Concerns have also been received regarding the impact the proposed MSCP would have on the adjacent Epsom Sports Club (hockey, cricket, tennis, lacrosse and croquet). This has been taken into consideration by Officers in the assessment of this application.
- 13.5 The Site currently comprises surface car parking, so the proposed addition of a MSCP would have a greater visual presence. Considering must be given to the potential impact of this on surrounding residential amenity and other facilities.

- 13.6 The proposed MSCP is to be sited over the current surface level car park located at the north eastern side of Epsom General Hospital. To the immediate south and west of the proposed siting of the proposed MSCP are the main hospital buildings and to the north and east is Epsom Sports Club (Hockey and Cricket) and Epsom Lawn Tennis Club. The nearest residential properties are set approximately 40m to the north in Elmslie Close and approximately 63m to the north for those on the south side of Dorking Road.
- 13.7 The nearest residential properties to the proposed MSCP are numbers 39 to 47 Dorking Road and 1 to 5 Elmslie Close. As above, the development is spaced between 40 and 70 metres from these residential properties. Due to the height, mass and bulk of the proposed MSCP and its positioning within the Epsom General Hospital site, it is likely that the proposed MSCP would have a minor adverse impact upon the existing outlook enjoyed at the closest residential properties. But, the separation distances are considered adequate and the potential loss of outlook is not considered to be unduly harmful or cause an overbearing impact. Furthermore, at these distances, it is considered that the proposal would not have a significant impact upon the daylight, sunlight or privacy enjoyed at these properties.
- 13.8 Epsom Sports Club are recreations grounds comprising open space for playing fields, sports courts and pitches, with associated pavilions and facilities. The proposed MSCP would be visible from the adjacent open spaces, but is not considered to adversely impact the recreational uses, including the sport and leisure uses, at the grounds. Concerns have been raised, stating that the proposal could raise a safeguarding issue. Officers acknowledge that Epsom Sports Club is a mixed club, for use by men, women and children. The nature of the proposed MSCP is not considered to raise safeguarding issues.
- 13.9 Epsom General Hospital comprises a number of buildings, of varying heights, many of which have been altered over time. Generally, the buildings are considered to be of poor quality, lacking any coherent masterplan. The proposed MSCP is considered an appropriate and compatible use to Epsom General Hospital and is not considered to adversely impact the services or care provision at the existing hospital buildings.
- 13.10 In summary, the proposal is not considered to adversely harm neighbouring amenity enjoyed at neighbouring properties. It is considered to comply with Policy DM10 of the Development Management Policies Document (2015).
- 13.11 Policy CS6 sets out that development should result in a sustainable environment and reduce, or have a neutral impact upon, pollution and climate change. The Council will expect proposals to demonstrate how sustainable construction and design can be incorporated to improve the energy efficiency of development. In order to conserve natural resources, minimise waste and encourage recycling, the Council will ensure that new development minimises the emission of pollutants, including noise, water and light pollution, into the wider environment.
- 13.12 Policy DM10 sets out that development proposal should have regard to the amenities of occupants and neighbours, including in terms of privacy, outlook, sunlight/daylight, and noise and disturbance.
- 13.13 A Noise Impact Assessment, dated 10.02.2020, accompanies this application. It reviews the likelihood of an adverse noise impact as a result of the proposed MSCP. The Assessment has considered BS8233:2014 and the World Health Organisation guidance for assessing noise level from the play areas which offer acceptable external amenity and is applicable to the gardens of the nearest neighbouring property. A reasonable standard of external amenity is considered to be 55 dB(A) LAeq,16hour and below.

13.14 The main new noise source associated with the proposed MSCP would be from additional cars, some of those being raised to a higher position on the top deck of the MSCP. Also, a higher density of cars located closer to Epsom General Hospital. The overall level of sound from the proposed MSCP, with the change in levels compared with existing conditions, has the potential to noticeably impact the noise level within the wards of Epsom General Hospital. Recommendations have been provided, where possible, to reduce the impact of the proposed MSCP.

13.15 The Local Planning Authority's Environmental Health team commented on this application on 15.02.2021. It sets out that there is an adverse noise impact predicted, with mitigation suggested within the Noise Impact Assessment. Subject to planning permission being granted, this should be installed (captured within a condition).

14 Air Quality

- 14.1 Paragraph 105e of the NPPF required adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
- 14.2 Paragraph 110e of the NPPF sets out that applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 14.3 Paragraph 170 of the NPPF sets out that planning decisions should prevent new development from contributing to, or being put at unacceptable risk from, or being adversely affected by (inter alia) unacceptable levels of air pollution.
- 14.4 Paragraph 181 of the NPPF sets out that opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management and green infrastructure provision and management.
- 14.5 Policy CS1 sets out that the Council should expect the development and use of land to contribute positively to the social, economic and environmental improvements necessary to achieve sustainable development - both in Epsom and Ewell, and more widely. Changes should protect and enhance the natural and built environments of the Borough and should achieve high quality sustainable environments for the present, and protect the quality of life of future generations.
- 14.6 Policy CS6 sets out that development should result in a sustainable environment and reduce, or have a neutral impact upon, pollution and climate change. The Council will expect proposals to demonstrate how sustainable construction and design can be incorporated to improve the energy efficiency of development. In order to conserve natural resources, minimise waste and encourage recycling, the Council will ensure that new development minimises the emission of pollutants, including noise, water and light pollution, into the wider environment.
- 14.7 An Air Quality Assessment, dated February 2020, accompanies this application. It sets out that the proposed development does not raise any significant or other residual adverse impacts on the health and/or quality of life for any existing or proposed receptors, as a result of any anticipated changes to air quality. It is considered that the proposed development complies fully with air quality related National and Local planning policy and any mitigation can, if considered necessary, be enforced by means of appropriate planning conditions.

- 14.8 The Local Planning Authority's Environmental Health provided a comment on this application on 15.02.2021. This does not specifically reference the Air Quality Assessment. Officers have therefore used their professional judgement and subject to planning permission being granted, a condition should be included, capturing the recommendations and mitigation measures recommended within the Air Quality Assessment.
- 14.9 SCC Highways formally provided a response on 25.03.2021. It recommended a planning condition, should planning permission be granted, requiring at least 20% of the available parking spaces to be provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply). The Applicant reviewed this condition wording with Officers and it was agreed to revise the wording of the condition, to reflect that originally proposed by SCC Highways (within SCC Highways' draft response, dated 09.03.2021). The updated recommended condition would require 10% of car parking charging to be provided with EV charging. It would then require a further 10% to be provided with infrastructure, for future provision of EV charging, which would be tied into a S106 Agreement.
- 14.10 The proposal, subject to imposition of conditions, is considered to comply with Policies CS1 and CS6 of the Core Strategy (2007).

15 Trees and Landscaping

- 15.1 Chapter 15 of the NPPF concerns the conservation and enhancement of the natural environment. Paragraph 170 sets out that planning decisions should contribute to and enhance the local environment by (inter alia) recognising the intrinsic character and beauty of the countryside and the wider benefits from ecosystem services, including trees and woodland.
- 15.2 Paragraph 175 of the NPPF sets out that development resulting in the loss or deterioration or irreplaceable habitats such as ancient woodland and ancient or veteran trees should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- Policy DM5 sets out that the Borough's trees, hedgerows and other landscape features will be protected and enhanced by (inter alia) planting and encouraging others to plant trees and shrubs to create woodland, thickets and hedgerows and requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include the planting of new semi-mature tree and other planting.
- 15.3 Policy DM5 further states that where trees, hedgerows or other landscape features are removed, appropriate replacement planting will normally be required. Consideration should be given to the use of native species as well as the adaptability to the likely effects of climate change.

Trees

- 15.4 There are no tree preservation orders relating to the Site or relating to trees on its boundaries.
- 15.5 A Tree Survey and Arboricultural Integration Report, dated 01.11.2019, accompanies this application.

- 15.6 There is very limited vegetation within the Site, with 19 trees. four trees are of moderate quality and landscape value, all of which are outside of the application boundary. 15 trees are of low arboricultural quality and no more than moderate landscape value and of those one is Category B, 10 are Category C and four are Category U.
- 15.7 The proposal does not seek to prune trees and it does not seem to make any incursions into the Root Protection Areas (RPA) of trees to be retained. Therefore, no trees to be retained would be directly harmed by the proposal.
- 15.8 The proposal seeks to remove three individual trees, comprising two Category C trees and one Category U tree and one group of Category U common ash. The three individual trees and the group of trees are required to be removed for maintenance reasons and not to facilitate the proposed MSCP. All of the trees to be removed are self-seeded in a narrow verge between the existing car park and the chain link boundary fence. There are no trees proposed to be planted in replacement for the trees to be removed.
- 15.9 The Local Planning Authority's Tree Officer has not commented on this application, so Officers have used their professional judgement in assessing this. As the trees proposed to be removed are young and of low quality and landscape value, it is not considered that their removal will detract from the landscape, nor have a detrimental visual impact on the character or appearance of the area. The Report sets out measures to protect retained trees in accordance with current standards and guidance, which would be secured within a planning condition, subject to planning permission being granted.
- 15.10 The proposal, subject to imposition of conditions, is considered to comply with Policy DM5 of the Development Management Policies Document (2015).

Landscaping

- 15.11 Officers recognise that due the nature of the proposal (a proposed MSCP over an existing surface level car park), there are limitations with regards to improvements to proposed landscaping. These gains are balanced and limited, in line with needs and aims of maximising car parking at Epsom General Hospital.
- 15.12 A Soft Landscaping Plan (BD0035-STRIFE-00-00-DR-LA-3001 – P04 – dated 20.01.2021) accompanies this application. It includes a tree planting schedule.
- 15.13 The soft landscaping is considered an improvement upon the current levels of planting and given that the majority of tree species will be retained, this would result in a net gain. As such, the soft landscaping scheme is considered acceptable.
- 15.14 The submitted landscaping scheme does not cover the final hard surface finish of the development. The Design and Access Statement at page 4.11 shows the intention to have a tarmac surface tied into the existing, where appropriate.
- 15.15 The application is not specific about the final finishes pedestrian areas within and leading around the car park and tying into Epsom General Hospital. As such, should planning permission be granted, a landscaping condition shall be imposed, to ensure a full specification of surfacing, soft and hard landscaping, planting and retention. The proposal is considered to comply with Policy DM5 of the Development Management Policies Document (2015).

16 Ecology

- 16.1 Chapter 15 of the NPPF relates to the conservation and enhancement of the natural environment. Paragraph 170 sets out that planning decisions should contribute to and enhance the natural and local environment by (inter alia) protecting and enhancing valued landscapes and sites of biodiversity. Development should, wherever possible, help to improve local environmental conditions, such as air and water quality
- 16.2 Paragraph 175 of the NPPF sets out that development whose primary objective is to conserve or enhance biodiversity should be supported, while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 16.3 Policy CS3 sets out that the biodiversity of Epsom and Ewell will be conserved and enhanced through the support for measures which meet the objectives of National and Local biodiversity action plans in terms of species and habitat.
- 16.4 Policy DM4 seeks to ensure that new development takes every opportunity to enhance the nature conservation potential of a Site and secure a net benefit to biodiversity.
- 16.5 An Ecological Impact Assessment, dated 16.01.2020, accompanies this application.
- 16.6 The Assessment sets out that the Site mainly comprises hardstanding, with small areas of amenity grassland, which does not offer suitable habitats for protected or notable species. The construction of the proposed MSCP represents an impact that is significant at Site level only, given the absence of any habitats of value. The precautionary mitigation, to avoid the removal of vegetation during the nesting bird season, must be followed to ensure that there is not a breach of the Wildlife and Countryside Act.
- 16.7 The Assessment sets out enhancement opportunities, resulting in new opportunities for nesting birds and a likely gain for biodiversity at the Site. If any protected species are found during proposed works (subject to planning permission being granted), work should be stopped immediately and an ecologist contacted for advice.
- 16.8 The Local Planning Authority's Ecologist confirmed that the proposal does not result in any notable loss of biodiversity. As such, no mitigation is required, but, local planning policy does require proposals to improve biodiversity, so enhancements should be required. Officers consider that this could be required by a planning condition.
- 16.9 The proposal, subject to imposition of conditions, is considered to comply with Policy CS3 and DM4.

17 Archaeology

- 17.1 Chapter 16 of the NPPF refers to the conservation and enhancement of the historic environment. Paragraph 189 states that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 17.2 Policy CS5 sets out that the Council will protect and seek to enhance the Borough's heritage assets including (inter alia) archaeological remains. The settings of these assets will be protected and enhanced.

- 17.3 Policy DM8 (seeks to resist the loss of Heritage Assets and instead promote the opportunity to conserve and enhance these. Specifically, on any major development site of 0.4ha or greater, applicants are required to undertake prior assessment of the possible archaeological significance of a site and the implications of the proposals.
- 17.4 A Heritage Desk Based Assessment, dated February 2020, accompanies the application. It sets out that the physical and non-physical effects, summarised below:

Physical effects

- 17.5 The proposal would not directly affect any designated heritage assets and no heritage assets of archaeological interest of comparable significance have been identified within the Site as part of the assessment. It also sets out that the assessment identified limited potential for presence of archaeological remains of prehistoric to medieval date within the Site. The Site has been subject to previous development, including stripping to facilitate construction of the car park. Such activity is likely to have compromised the survival of potential archaeological remains within the Site.

Non-physical effects

- 17.6 The Site does not constitute a key element of the setting of the majority of designated heritage assets located within the surrounding landscape and following a detailed assessment, it has been ascertained that development of the Site would not alter the setting of a group of listed buildings located along Dorking Road, over 100m west of the Site.
- 17.7 With regard to Woodcote and Chalk Conservation Areas, and associated Listed Buildings, and Grade II Listed Buildings along Dorking Road, including White Horse Public House and the 67 and 69 Dorking Road, this assessment has established that the proposed redevelopment would introduce a degree of change in the setting through the introduction of new built form. However, the key contributors to the significance of these assets would be preserved, and this change needs to be considered given the existing urban settings of these assets. As such, the impact of the proposal on the Listed Buildings and Conservation Areas would be limited, due to the existing modern context in which the assets are experienced and the design treatments which aim to respond to the local materials and palette. When all aspects are considered, the proposed development would result in some limited harm to those designated heritage assets, falling in within the lower end of the spectrum of less than substantial harm. In accordance with the NPPF, when less than substantial harm (lower end) to designated heritage assets has been identified, *'this harm should be weighed against the public benefits of the proposal'* (Para. 196).
- 17.8 SCC Archaeology commented on the application on 16.03.2020, stating that the Applicant's assessment considered the available archaeological and historical resource to assess the potential of the Site. SCC Archaeology considers that the archaeological potential of the Site is unknown and so further work in the form of an archaeological trial trench evaluation is required, to properly determine whether heritage assets of archaeological significance remain within the Site.
- 17.9 Subject to planning permission being granted, SCC Archaeology recommend a planning condition, to secure the required archaeological work.
- 17.10 The proposal, subject to imposition of conditions, is considered to accord with policy CS5.

18 Flood Risk and Drainage

- 18.1 Chapter 14 of the NPPF relates to meeting the challenge of climate change, flooding and coastal change. Paragraph 155 stipulates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Paragraph 163 sets out that when determining any planning applications, Local Planning Authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.
- 18.2 Policy CS6 out that proposals for development should result in a sustainable environment and reduce, or have a neutral impact upon, pollution and climate change. The Council will expect proposals to demonstrate how sustainable construction and design can be incorporated to improve the energy efficiency of development – both new build and conversion. In order to conserve natural resources, minimise waste and encourage recycling, the Council will ensure that new development (inter alia) has no adverse effects on water quality, and helps reduce potential water consumption for example by the use of water conservation and recycling measures and by minimising off-site water discharge by using methods such as sustainable urban drainage and avoids increasing the risk of, or from, flooding.
- 18.3 The Site is within Flood Zone 1 (Low Probability of Flooding) and partly within a Critical Drainage Area.
- 18.4 The application is accompanied by a Surface Water Drainage Strategy Report, dated February 2020. It recognises that the Site is within flood zone 1 and there is no evidence to show previous flooding events at the Site.
- 18.5 The proposal sets out that the surface water system would discharge into the public surface water sewer at a restricted rate. The report demonstrates that the proposed drainage measures means that no property would be at risk of flooding if the development was to proceed and that suitable means of surface water and foul drainage can be achieved for the proposed development.
- 18.6 Surrey County Council Local Lead Flood Authority (LLFA) commented on the application on 05.03.2020, setting out that it is satisfied with the proposed drainage scheme, subject to conditions, should planning permission be granted.
- 18.7 A formal response from the Environment Agency outlines that the application has a low environmental risk and so there are no comments to make.
- 18.8 Thames water confirmed in its response dated 18.02.2021 that there are no public sewers crossing or close to the development but the proposed development is located within 15 metres of a strategic sewer and therefore a condition should be added to any planning permission granted.
- 18.9 Thames Water sets out that it would recommend petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Thames Water sets out that with regards to the water network infrastructure capacity, there would be no strong objection to the planning application, but that an Informative should be added to any planning permission granted.
- 18.10 The proposed development is considered to comply with Policy CS6 of the Core Strategy (2007).

19 Contamination

- 19.1 Policy DM17 sets out that where it is considered that land may be affected by contamination, planning permission will only be granted for development provided that the following criteria are satisfied:
- all works, including investigation of the nature of any contamination, can be undertaken without escape of contaminants which could cause unacceptable risk to health or to the environment;
 - it is demonstrated that the developed site will be suitable for the proposed use without risk from contaminants to people, buildings, services or the environment including the apparatus of statutory undertakers.
- 19.2 The Local Planning Authority's Contamination Land Officer commented on 02.03.2020, with no objection, recommending a full ground contamination and ground gas condition should planning permission be granted.
- 19.3 The proposal, subject to imposition of conditions, is considered to comply with Policy DM17.

20 Crime and Community Safety

- 20.1 A response was received from the Crime Reduction Advisor & Design Out Crime Officer, setting out that the car parking at Epsom General Hospital is assessed regularly by the British Parking Associated Safer Parking Scheme, who is aware of the plans for a proposed MSCP. At the present time, this would be a positive move in terms of safe and available car parking.

21 Community Infrastructure Levy

- 21.1 The scheme is not liable for community infrastructure levy.

22 Conclusion

- 22.1 The Site at present comprises surface level car parking, with no built form. It forms part of the wider Epsom General Hospital site, which comprises an ad hoc collection of altered buildings, with varying heights and design styles, lacking any coherent masterplan. The Site also falls in close proximity to the Woodcote Conservation Area.
- 22.2 The proposal seeks the construction of a multi-storey car park (MSCP), comprising 527 car parking spaces, the reconfiguration of the existing surface car parking surrounding the proposed structure, providing an additional 104 car parking spaces and improvements to the access road for vehicles and pedestrians, from Dorking Road.
- 22.3 The proposed MSCP would undeniably have a visual presence, but consideration is given to the requirements for this and the associated public benefits, which include:
- Addressing car parking pressures within Epsom General Hospital, by replacing lost car parking spaces and accommodating required car parking spaces, to future proof car parking needs at the hospital
 - Improving pedestrian routes
 - Improving patient and staff experiences.

22.4 In considering the requirement for the scheme and its associated public benefits, Officers consider that the principle of a proposed MSCP is acceptable, subject to material considerations. The design of the proposal has evolved in order to better respond to its surrounding context and to help mitigate adverse impacts on heritage assets, but Officers do accept that there is a degree of harm caused to the setting of the adjacent Conservation Area. In balancing this against the public benefits of the scheme, in this case, the requirement for and the public benefits arising from the MSCP are considered to outweigh the harm caused by the proposal, when considering paragraph 196 of the NPPF.

22.5 Officers recommend approval, subject to a completed S106 Legal Agreement and Conditions.

23 Recommendation

23.1 Part A: Grant planning permission, in accordance with the proposed conditions and subject to a Section 106 Agreement being signed by 12 August 2021, and securing Heads of Terms and conditions (detailed below).

23.2 Part B: In the event the Section 106 Agreement referred to in Part A is not completed by 12 August 2021, the Head of Planning is authorised to refuse the application for the following reason:

23.3 In the absence of a completed legal obligation under section 106 of the Town and Country Planning Act 1990) as amended), failing to provide a financial monitoring fee to Surrey County Council towards future auditing of the site travel plan.

Heads of Terms

Travel plan

- A financial monitoring fee to be paid by the Applicant/Developer to Surrey County Council within three months of the multi-storey car park being first occupied, of £6,150 towards future auditing of the site travel plan.

Electric vehicle charging sockets

- A planning condition requires the development to provide at least 10% of the available parking spaces to be provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply).

A further 10% of the available parking spaces shall be provided with the required infrastructure (ducting, electrical supply, cabling and feed pillar/s) for the future provision of additional electric vehicle charging sockets, capable of accommodating 7 kw Mode 3 Type 2 connectors fed by a 230v AC 32 Amp single phase dedicated supply, (or current equivalent standard).

Conditions

- (1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.

- (2) In accordance with approved plans, the development shall provide 527 car parking spaces within the multi storey car park and 104 car parking spaces at surface level

Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans to comply with Policy CS5 of the Core Strategy (2007).

- (3) The development hereby permitted shall be carried out in accordance with the following approved plans:

J1250-STRIFE-WP-XX-PL-AX-91003 P1 – Location Plan – dated 05.02.2020

J1250-STRIFE-WP-XX-PL-AX-91002 P2 – Existing Site Plan – dated 05.02.2020

J1250-STRIFE-XX-01-PL-AX-90601 P1 – Existing Site Sections A and B – dated 05.02.2020

J1250-STRIFE-XX-01-PL-AX-90602 P1 – Existing Site Sections C and D – dated 05.02.2020

J1250-STRIFE-WP-XX-PL-AX-P3050 P6 – General Arrangement Elevations East and West – dated 26.03.2021

J1250-STRIFE-WP-XX-PL-AX-P30502 P6 – General Arrangement Elevations North and South – dated 26.03.2021

J1250-STRIFE-XX-01-PL-AX-30601 P2 – General Arrangement Sections A and B – dated 05.02.2020

J1250-STRIFE-XX-01-PL-AX-30602 P2 - General Arrangement Sections C and D – dated 05.02.2020

J1250-STRIFE-WP-00-PL-AX-P30100 P3 – General Arrangement Plan Level 00 – dated 25.01.2021

J1250-STRIFE-WP-01-PL-AX-P30101 P3 – General Arrangement Plan Level 01 – dated 25.01.2021

J1250-STRIFE-WP-02-PL-AX-P30102 P3 – General Arrangement Plan Level 02 – dated 25.01.2021

J1250-STRIFE-WP-03-PL-AX-P30103 P3 - General Arrangement Plan Level 03 – dated 25.01.2021

J1250-STRIFE-WP-04-PL-AX-P30104 P3 – General Arrangement Plan Level 04 – dated 25.01.2021

J1250-STRIFE-WP-05-PL-AX-P30105 P3 - General Arrangement Plan Level 05 – dated 25.01.2021

1250-STRIFE-WP-RL-PL-AX-P30106 P3 - General Arrangement Plan Roof Plan – dated 25.01.2021

J1250-STRIFE-WP-XX-PL-AX-91001 P3 – Proposed Site Plan – dated 25.01.2021

Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans to comply with Policy CS5 of the Core Strategy (2007).

- (4) Works related to the construction of the development hereby permitted, including works of demolition or preparation prior to building operations shall not take place other than between the hours of 08.00 to 18.00 hours Mondays to Fridays; 08.00 to 13.00 hours Saturdays; with no work on Saturday afternoons (after 13.00 hours), Sundays, Bank Holidays or Public Holidays.

Reason: In order to safeguard the amenities of the occupiers of neighbouring properties in accordance with Policy DM10 of the Development Management Policies 2015.

- (5) No development shall take place until details of existing and proposed finished site levels, finished floor and ridge levels of the buildings to be erected, and finished external surface levels have been submitted to and approved in writing by the local planning authority. The development shall thereafter be constructed in accordance with the approved details.

Reason: In order to safeguard the visual amenities of the area in accordance with Policy CS5 of the Core Strategy (2007) and Policy DM10 of the Development Management Policies 2015.

- (6) Prior to the commencement of the façade of the building, details and samples of the external materials to be used for the development shall be made available to be approved by the local planning authority on site. The work shall not be carried out otherwise than as to conform to approve samples

Reason: In the interest of the character and appearance of the conservation area, in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM8, DM9 and DM10 of the Development Management Policies 2015.

- (7) Prior to commencement of above ground works/the relevant part of the development hereby permitted, a sample of each of the proposed brick finishes (1m X 1m panel) shall be constructed on site for inspection and approval by the local planning authority on site. These shall illustrate the proposed brick in colour, texture, module, bond, pointing and mortar colour proposed for the building and shall be retained on site as a model for the work on site. The work shall not be carried out otherwise than as to conform to approve samples

Reason: To secure a satisfactory appearance in the interests of the visual amenities and character of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM9 and DM10 of the Development Management Policies 2015.

- (8) No development shall take place until details of the design and external appearance of all railings, fences, gates, walls, bollards and any other means of enclosure have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details prior to the development first being occupied/brought into use and shall thereafter be retained.

Reason: To secure a satisfactory appearance in the interests of the visual amenities and character of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM9 and DM10 of the Development Management Policies 2015.

- (9) Prior to the first use of the new areas of hard surfacing, details shall be submitted to and approved in writing by the local planning authority. The development shall be carried out fully in accordance with the approved details and so maintained.

Reason: To reduce surface water run-off from the site in line with Policy CS6 of the Core Strategy (July 2007) and Policy DM10 of the Development Management Policies 2015.

- (10) In this condition "retained tree" means an existing tree, which is to be retained in accordance with the approved plans and particulars; and paragraphs (a) and (b) below shall have effect until the expiration of 5 years from the first occupation of the development

a) no retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned other than in accordance with the details set out in the Tree Report and Tree Protection Plan (dated 01.11.2019), without the written approval of the Borough Council. Any pruning shall be carried out in accordance with British Standard 3998 (tree work) and in accordance with the arboricultural method statement

b) if any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Borough Council

c) tree protection shall be maintained in-situ and not moved or removed until all construction has finished and equipment, materials, or machinery are removed from site

d) The arboricultural protection information and plans submitted as part of the application, and listed in the approved plans condition, or submitted to meet a condition of consent shall be implemented and adhered to at all times during the construction process unless otherwise agreed in writing with the Borough Council. This shall include any requirement for arboricultural supervision and site monitoring. The development thereafter shall be implemented in strict accordance with the submitted details

Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM5 and DM9 of the Development Management Policies 2015.

- (11) Before development takes place tree protection measures shall be installed and any further information provided in accordance with the submitted arboricultural information. The applicant shall arrange a pre-commencement meeting after the installation of the tree protection between the Borough Council and the applicant's project arboriculturist to allow inspection and verification of the protection measures

Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM5 and DM9 of the Development Management Policies 2015.

- (12) A hard and soft landscaping plan and a soft landscaping plan is submitted with this application (J1250-STRIPE-WP-XX-PL-AX-91004 P1 – Hard and Soft Landscaping Plan – dated 05.02.2020 and BD0035-STRIPE-00-00-DR-LA-3001 – Soft Landscaping Plan – dated 20.02.21

No development, above ground floor slab level, shall commence until a finalised scheme of hard and soft landscaping has been submitted to the Local Planning Authority for approval, which shall include details of all existing trees on the land, and details of any to be retained, together with measures for their protection, in the course of development. The

scheme shall indicate the location and species of plants and trees to be planted on the site. The approved scheme shall be implemented so that planting can be carried out during the first planting season following the final occupation of the building(s) or the completion of the development whichever is the sooner. All planted materials shall be maintained for five years and any trees of planted removed, dying, being damaged or becoming diseased within that period shall be replaced in the next planting season with others of similar size and species to those originally required to be planted unless the Local Planning Authority gives written consent to any variation

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM5 and DM9 of the Development Management Policies 2015.

- (13) No external lighting shall be installed on the site or affixed to any buildings on the site unless the local planning authority has first approved in writing details of the position, height, design, measures to control light spillage and intensity of illumination. Only the approved details shall be installed. Note this relates to the final lighting solution, not during the construction phase.

Reason: In order to safeguard the amenities of the occupiers of neighbouring properties and visual amenity in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM9 and DM10 of the Development Management Policies 2015.

- (14) Prior to the first occupation of the proposed development a Travel Plan, to include the staggering of staff shift patterns, shall be submitted for the written approval of the Local Planning Authority in accordance with the sustainable development aims and objectives of the National Planning Policy Framework and Surrey County Council's "Travel Plans Good Practice Guide". And then the approved Travel Plan shall be implemented upon first occupation of the Multi-storey car park and for each and every subsequent occupation of the development, and thereafter, maintain and develop the Travel Plan to the satisfaction of the Local Planning Authority

Reason: In recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2019

- (15) The development hereby approved shall not be occupied unless and until at least 10% of the available parking spaces are provided with a fast/slow charge socket, with details of any split to be agreed with the Local Planning Authority. (Current minimum requirement for fast charge sockets: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply). This required infrastructure shall be provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the Multi-storey Car Park, and once provided, shall be permanently retained and maintained to the satisfaction of the Local Planning Authority.

Reason: In recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2019

- (16) Prior to the first occupation of the Multi-storey car park the applicant shall design and implement a scheme in consultation with The County Highway Authority to direct all vehicles turning left onto Dorking Road when leaving the application site to exit only using the westernmost egress onto Dorking Road to mitigate queuing within the application site.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users

- (17) The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users

- (18) The development hereby approved shall not be first occupied unless and a Car Park Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the Car Park Management Plan shall be implemented upon the first occupation of the multi-storey car park and retained in perpetuity

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users

- (19) The development hereby approved shall not be first occupied unless and until directional signage has been erected within the hospital site to direct staff, visitors, ambulances, deliveries and drop-offs to ensure the free flow of vehicles within the application site, in accordance with a scheme to be submitted to and approved in writing by The Local Planning Authority

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users

- (20) No development shall commence until a Construction Transport Management Plan, to include details of:
- (a) parking for vehicles of site personnel, operatives and visitors
 - (b) loading and unloading of plant and materials
 - (c) storage of plant and materials
 - (d) programme of works (including measures for traffic management)
 - (e) HGV deliveries and hours of operation
 - (f) vehicle routing
 - (g) measures to prevent the deposit of materials on the highway
 - (h) on-site turning for construction vehicles has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users

- (21) No development shall commence until a Temporary Visitor Car Parking Management plan, to include details of management of visitor parking during construction of the multi-storey car park has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users

- (22) No development shall commence until a Temporary Staff Car Parking Management plan, to include details of:
- a) management of staff parking during construction of the multi-storey car park
 - b) temporary park and ride facilities have been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users

- (23) The scheme shall be carried out in accordance with the protection, mitigation and enhancement measures detailed in the Ecological Impact Assessment, dated 16.01.2020 prior to the first occupation of the development and/or in accordance with the approved timetable detailed in the ecological assessment and plan. The approved measures shall thereafter be maintained.

Reason: To enhance biodiversity and nature habitats in accordance with Policy CS3 of the Core Strategy (2007) and Policy DM4 of the Development Management Policies 2015.

- (24) Prior to occupation of the building, a scheme to enhance the biodiversity interest of the site shall be submitted to and agreed in writing by the local planning authority. The scheme shall be implemented in full and thereafter maintained.

Reason: To enhance biodiversity and nature habitats in accordance with Policy CS3 of the Core Strategy (2007) and Policy DM4 of the Development Management Policies 2015.

- (25) No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact/cause failure of local underground sewerage utility infrastructure

- (26) The development shall accord with the recommendations and mitigation suggested within the Noise Impact Assessment (10.02.2020)

Reason: To protect the occupants of nearby residential properties from noise disturbance in accordance with Policy DM10 of the Development Management Policies 2015.

- (27) The development shall accord with the recommendations and mitigation suggested within the Air Quality Assessment (February 2020).

Reason: To protect the occupants of nearby residential properties from noise disturbance in accordance with Policy DM10 of the Development Management Policies 2015.

- (28) No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority

Reason: The site is of high archaeological potential and it is important that the archaeological information should be preserved as a record before it is destroyed by the development in accordance with Policy CS5 of the Core Strategy (2007)

- (29) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
- a) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 6.8 l/s.
 - b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.)
 - c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected
 - d) Details of drainage management responsibilities and maintenance regimes for the drainage system
 - e) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site

- (30) Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls)

Reason: To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS

- (31) Unless otherwise agreed by the Local Planning Authority, the following must be undertaken prior to occupation of the new development, in accordance with current best practice guidance:

A site investigation and risk assessment to determine the existence, extent and concentrations of any made ground/fill, ground gas and contaminants (including asbestos) with the potential to impact sensitive receptors on and off site. The scope and detail of these are subject to the approval in writing by the local planning authority. The results of the investigation and risk assessment shall be submitted to and approved by the Local Planning Authority. If ground/groundwater contamination, filled ground and/or ground gas is found to present unacceptable risks, a detailed scheme of risk management measures shall be designed and submitted to the Local Planning Authority for approval. The site shall

be remediated in accordance with the approved measures and a verification report shall be submitted to and approved by the Local Planning Authority. If, during the course of development, any contamination is found which has not been identified in the site investigation, additional measures for the remediation of this source of contamination shall be submitted to and approved in writing by the local planning authority. The remediation of the site and verification report shall incorporate the approved additional measures

Reason: To control significant harm from land contamination to human beings, controlled waters, buildings and or/ecosystems as required by Policy DM10 of the Development Management Policies Document (2015).

- (32) Prior to occupation, all dwellings hereby approved shall comply with Regulation 38 of the Building Regulations – Fire Safety

Reason: In order to comply with Policy CS6 (Sustainability in New development) of the Core Strategy (2007)

- (33) Prior to commencement of works, full details and a maintenance programme for the green walls shall be submitted to and approved by the Local Planning Authority. The green walls shall be planted prior to the occupation of the car park.

Reason: To ensure the establishment and maintenance of an appropriate green walls scheme, in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM5 and DM9 of the Development Management Policies 2015.

Informative(s):

- (1) The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149)
- (2) Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage
- (3) It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to: <http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types
- (4) Notwithstanding any permission granted under the Planning Acts, no signs, devices or other apparatus may be erected within the limits of the highway without the express approval of the Highway Authority. It is not the policy of the Highway Authority to approve the erection of signs or other devices of a non-statutory nature within the limits of the highway

- (5) All bridges, buildings or apparatus (with the exception of projecting signs) which project over or span the highway may be erected only with the formal approval of the Transportation Development Planning Team of Surrey County Council under Section 177 or 178 of the Highways Act 1980
- (6) The permission hereby granted shall not be construed as authority to obstruct the public highway by the erection of scaffolding, hoarding or any other device or apparatus for which a licence must be sought from the Highway Authority Local Highways Service.
- (7) There are public sewers crossing or close to the development. If significant work is planned near to sewers, it's important that the risk of damage is minimised. Thames Water will need to check that the development doesn't limit repair or maintenance activities, or inhibit the services it provides in any other way. The applicant is advised to read the guide working near or diverting pipes
- (8) Thames Water would recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol/oil interceptors could result in oil-polluted discharges entering local watercourses
- (9) Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, IT would not have any objection to the planning application, based on the information provided
- (10) Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, IT would not have any objection to the planning application, based on the information provided
- (11) On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, IT would not have any objection to the planning application. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development
- (12) If the applicant is planning on using mains water for construction purposes, it's important it lets Thames Water know before this is used, to avoid potential fines for improper usage
- (13) Your attention is drawn to the series of publications produced by the Department for Communities and Local Government (CLG), which provides information for the responsible person about the Fire Safety Order
- (14) Responsibility for ensuring that a building is provided with appropriate fire safety arrangements rests with the responsible person, once the building is occupied. The responsible person should, therefore, ensure that the fire safety arrangements in place are adequate and comply fully with the requirements of the Fire Safety Order
- (15) Fire safety information in accordance with Regulation 38 of the Building Regulations 2010 should be provided to the responsible person at the completion of the project or when the building or extension is first occupied. This information should take the form of a fire safety manual and form part of the information package that contributes to the fire risk assessment that will need to be carried out under the Regulatory Reform (Fire Safety) Order 2005

- (16) Passive fire protection measures, particularly fire stopping, fire barriers and fire resisting compartmentation, restricts the spread of smoke and fire through a building through hidden areas such as voids. It is recommended that careful attention is given to this detail during construction. Certification of this work can be beneficial to confirm the suitability of the structure to meet its performance requirement lay out in this design application
- (17) Surrey Fire and Rescue Service (SFRS) would strongly recommend that consideration is given to the installation of AWSS (ie; Sprinklers, Water Mist etc) as part of a total fire protection package to:

protect life; protect property, heritage, the environment and our climate; help promote and sustain business continuity; and permit design freedoms and encourage innovative, inclusive and sustainable architecture.
- (18) The use of AWSS can add significant benefit to the structural protection of buildings in the event of a fire. Other benefits include supporting business recovery and continuity if a fire happens. SFRS are fully committed to promoting Fire Protection Systems for both business and domestic premises.