

PLANNING COMMITTEE UPDATE REPORT

9 November 2023

App Number	22/00923/FUL
Item Number	4
Address	Former Police Station, Church Road, Epsom, KT17 4PS
Proposal	Demolition of the existing police station (Use Class E) and ambulance station (Sui Generis) and erection of a new residential, nursing and dementia care home for the frail elderly (Use Class C2) comprising ancillary communal facilities and dementia care, basement parking, reconfigured vehicular access onto Church Street, landscaping and all other associated works
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CORRECTIONS AND UPDATES

1. Groundwater

- 1.1. The applicant, neighbour objector and Epsom Civic Society have responded to the comments in the officer report relating to groundwater issues (contained at para 17.9-17.16 of the officer report).

Applicant

- 1.2. The applicant has drawn attention to an additional screening assessment (attached at Appendix 1). It uses nearby borehole measurements to conclude a water table averaging at 35 AOD, range of 10m and high fluctuation in 2013/2014 (the same as the subject site. Climate change allowances have been included. The Basement Impact Assessment notes:

*“However, during occasional short periods during unseasonably wet winters, it is possible that groundwater levels within the Chalk will rise close to ground level and over top the contact with the overlying Thanet Sands Formation and flood the overlying RTDs. This groundwater will normally distribute throughout the RTDs, given the significant storage capacity of these deposits. However, if the high Chalk groundwater levels are sustained over an extended time period (c. several weeks) it is possible that occasionally groundwater levels could rise within the RTDs to elevations above the base of the proposed basement. Under this scenario, the basement structure would therefore reduce the cross-sectional area of RTDs through which the groundwater could flow and disperse, which could result in a rise in the groundwater level on the upgradient side of the structure.
3.”*

- 1.3. It continues by suggesting that:

*“the potential rise in groundwater level in the RTDs on the upgradient side of the basement during a short duration groundwater flooding event, has been calculated to be **6.7cm**. This is a conservative assessment assuming groundwater will rise to the top of the RTDs.*

When considering the distance between this location and the location of “No. 50 The Parade” (25m), it is assessed that the ensuing effect on groundwater levels beneath “No. 50 The Parade” will be negligible, and not contribute to any additional risk of flooding.”

Objector

- 1.4. The objector has emailed Councillors on 8 November 2023, the contents of which are summarised here and contained at Appendix 2. These include:
- The appendices from EEBC's Strategic Flood Risk Assessment (SFRA) in Jacob's 2018 report were not included in the developer's (SLR's) Flood Risk and Surface Water Management Statement (Version 2 dated May 2022). These clearly show groundwater flood events in 2000, 2002 and 2014. See attached Jacob's Historic Flooding Map (Figure 104) and Groundwater Emergence Map (Figure 110). This is also contained in the EEBC's Section 19 report on the 2014 flooding event in the Borough attached in the following link: [8-Epsom-and-Ewell-Borough-S19-Report.pdf \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/8-Epsom-and-Ewell-Borough-S19-Report.pdf).
 - Paragraphs 17.15 and 17.16 of the committee report stress the importance of the LLFA comment but an email from the LLFA (30th October 2023) states "we do not have the powers or the expertise to provide formal comments on groundwater". The LLFA have repeatedly stated in all their formal responses to the application that their comments refer to *surface water flooding* only.

Epsom Civic Society

- 1.5. Attached at Appendix 3 is further correspondence from Epsom Civic Society reaffirming the comments from the objector above and indicating that groundwater information is not complete and that it should be comprehensively assessed at application stage rather than subject to pre commencement condition.

2. Report corrections

- 2.1. References to 30 parking spaces in the table following paragraph 1.25 and at paragraphs 3.6 and 14.24 is incorrect. It is 31 spaces. A surface level space was included in the assessment but not correctly noted in parts of the report.
- 2.2. The site area in the table following paragraph 1.25 should read 0.4 hectares.
- 2.3. Paragraph 1.8 incorrectly paraphrases paragraph 202 of the NPPF. Rather than being a presumption against granting permission where there is less than substantial harm, it should read that the harm should be weighed against the public benefits.
- 2.4. Paragraphs 1.9 and 9.4 refer to the removal of three trees, which is an earlier proposal. The conditioned landscape plan indicates no tree loss of 31 planted trees. Tree 6 also no longer exists.
- 2.5. Section 7 deals with affordable housing. For the avoidance of doubt, the Council's planning officer is concluding that having regard to the scheme being for a care home

rather than for residential units, the affordable housing requirements should not be delivered. Whilst policy conflict exists, it is not unacceptable.