
Planning Application

Cedars Cottage, 16 Church Street, Epsom,
KT17 4QB

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Cedars Cottage, 14 Church Street, Epsom, KT17 4QB



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1. Introduction

- 1.1. This Planning Statement has been prepared to accompany a planning application, submitted to Epsom and Ewell Borough Council (EEBC). The description of development is as follows:

"Listed building consent and change of use from office to four dwellings"

- 1.2. The purpose of this Planning Statement is to outline the proposal and set out how it accords with relevant planning policy.

Report Structure

- 1.3. This report sets out the planning context for the proposed development, including a description of the site as existing. It concludes by setting out the case for development, providing an assessment against the relevant planning policies.

- 1.4. The following documents are submitted alongside this report:

- Application Forms;
- Heritage Report; and
- A suite of drawings.

2. The Site and Surrounding Context

Background to the Application

- 2.1. This application is for the change of use of Grade II Listed Cedars Cottages from office (Class E) to residential (Class C), including internal alterations.
- 2.2. As set out in the accompanying Heritage Report, Cedars Cottage was constructed in the late 17th Century, and was used for residential purposes until c. 1970/80 when it was converted into a GP surgery. In 1990, the building was converted into offices.

The Site and Adjoining Area

- 2.3. Cedars Cottage is a two storey office building, with a single storey extension across the width of the rear garden. Cedars Cottage is set back from the highway with a parking area to the front, and a small brick wall to the highway boundary. The building borders the 'Outhouse of No. 18' to the south and has a small lean-to timber structure up to its boundary to the north.
- 2.4. Access to Cedars Cottage is gained from Church Street (B284), a main route into the town centre and the A24 with a number of bus routes.
- 2.5. Church Street is characterised by large detached properties set back from the road in both residential and commercial uses. The site includes private access and car parking.
- 2.6. The site is located in Epsom, approximately 500m south of the town centre . It is located within Epsom and Ewell Local Planning Authority. It is within close proximity of the A24 and is well serviced by Epsom Railway Station and the M25.



Figure 2.1: Satellite Image of the Site (denoted by a red outline) [Not to Scale]

Heritage Assets



Figure 2.2: Excerpt from Historic England Map Search (the site is denoted by a red outline) [Not to Scale]

- 2.7. As shown in Figure 2.2, Cedars Cottage is a Grade II Listed Building (List IUD: 128951). In addition, the neighbouring property to the south at 18 Church Street is Grade II Listed (List IUD: 1028587) and so is its outbuilding (List IUD: 1378228). The outbuilding adjoins Cedars Cottage to the south. The Cedars, 14 Church Street, adjacent to the north boundary of the site is Grade II* Listed (List IUD: 1378227).
- 2.8. Cedars Cottages is located within the Church Street Conservation Area noted for its 'prestigious houses' and in particular the Grade II* listed St Martin's Parish Church (List UID: 1028592) and its 15th Century tower. Further information on the site and the neighbouring area can be found in the accompanying Heritage Report.

TPOs

- 2.9. There are several trees within the perimeter of the site, including a series of designated Tree Preservation Orders (TPOs) located in the neighbouring plot at the rear of 14 Church Street (TPO 375/T1 (London Plane), TPO 375/T2 (Yew), TPO 375/T3 (Yew) and TPO 375/T4 (Pride of India)). In addition, TPO 58/T15 (Lime) is located to the rear of 18 Church Street.

Flood Risk

- 2.10. Cedars Cottage is located within Flood Risk Zone 1, with a low risk of flooding.

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Planning History

- 2.11. There are no recent applications associated with Cedars Cottage. In 1990, a renewal of change of use was granted by EEBC from a Doctor's Surgery to offices (ref: 90/00132/FUL). However, there are a number of applications on Church Street within the Conservation Area and in close proximity of Cedars Cottages which are of relevance to this proposal.
- 2.12. Significantly, the flat conversion at the neighbouring property, The Cedars, set a precedent for the conversions of listed buildings, providing a precedent for flattened development on the street and demonstrating that the proposal at Cedars Cottage will integrate into the wider landscape.

Proposal	Address	Reference Number	Outcome	Date
<i>"Removal of three internal partition walls (Listed Building Consent)"</i>	24 Church Street, Epsom, KT17 4QB	10/00541/LBA	Granted	07/10/2010
<i>"Alterations, extension and conversion of existing Grade II* listed building to for seven one and two bed flats and attached two-storey cottage."</i>	The Cedars, 14 Church Street, Epsom, KT17 4QB	07/00151/FUL	Granted	26/07/2007

3. Proposed Development

- 3.1. This section sets out the design of the proposal and how it responds to its context.

Use

- 3.2. This planning application is for a change of use to residential (C3) from office (class E).

Amount

- 3.3. The office to residential conversion at Cedars Cottage will provide 4 net additional homes in Epsom, one 2 bed flat and three 1 bed flats.

Layout and Scale

- 3.4. The gross internal area of the property is approximately 245 square metres. This is broken down as follows;

- Flat 1 - 54 m²;
- Flat 2 - 94 m²;
- Flat 3 - 41 m²; and
- Flat 4 - 54 m².

Appearance

- 3.5. The development proposals include no alterations to the traditional 17th century front elevations of the property.
- 3.6. Minimal interventions are required to the rear of the property in order to accommodate kitchen extracts and one additional set of French Doors. Due to the extensive alterations and rear extension to the property in the 1990s, the proposed exterior alterations are minimal and only affect the modern section of the property.
- 3.7. The proposed internal alterations only affect the modern finishes, including the moving internal stub walls where necessary.

Landscaping

- 3.8. The proposed development will retain and enhance the existing landscaping, with additional planting to the front of the property and will result in not result in any damage to any trees on the site.
- 3.9. The rear garden will be split between the two ground floor flats, which will be maintained by the respective properties.

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Access and Parking

- 3.10. The proposed development will retain access from Church Street and the permeable gravel parking at the front of the property, with provision for 8 parking spaces (2 per flat).

4. Planning Policy Framework

- 4.1. This section sets out the planning policy context for the site, including both adopted and emerging policy.

National Planning Policy

- 4.2. Relevant material considerations include the National Planning Policy Framework 2019 (NPPF) and the Planning Practice Guidance (PPG). These set out wider spatial policies which have greater weight afforded to them where Development Plan policies are silent on a particular matter, or where the Development Plan is out of date.
- 4.3. This particularly relates to the presumption in favour of sustainable development which lies at the heart of the NPPF (paragraph 10). Paragraph 11 of the NPPF sets out the presumption and what this means for plan making and decision taking.
- 4.4. With regards to sustainability, this is described at a high level in paragraph 7, as “*meeting the needs of the present without compromising the ability of future generations to meet their own needs.*” Paragraph 8 then sets out the strands of sustainability – economic, social and environmental, all of which should be pursued mutually.
- 4.5. As set out in Annex 1 of the NPPF, when determining the weight attached to both existing and emerging Development Plan policies, it is important to assess them relative to their degree of conformity with national planning policy.

Adopted Local Planning Policy

- 4.6. The adopted Local Development Plan in EEBC comprises:

- The Core Strategy (2007);
- Development Management Policies Document (2015);
- Surrey Minerals Plan (2011); and
- Any made Neighbourhood Plans.

The Core Strategy (2007)

- 4.7. The Core Strategy policies of relevance to this application include but are not limited to:
- Policy CS5 ensures that the Borough’s heritage assets are protected and enhanced. This includes both historic buildings and conservation areas. The policy sets out that development should create attractive environments, reinforce local distinctiveness and character.
 - Policy CS6 requires proposals to result in a sustainable environment and reduce, or have a neutral impact upon, pollution and climate change.

- Policy CS8 sets out that housing development is located within the defined built up areas of Epsom and Ewell allowing access to services, facilities and public transport. Low density development is expected to retain local character and distinctiveness.
- Policy CS11 ensures that a cautious approach is adopted with regard to the loss of employment land. Loss of employment land will be resisted within Epsom Town Centre, of which the sites lies just outside.
- Policy CS16 encourages development proposals to be well located to minimise the need for travel as well as provide appropriate and effective parking provision.

Development Management Plan 2015

- 4.8. The Development Management Plan was adopted in 2015 and provides a development control approach to planning applications to achieve a greater focus on sustainable and high quality development with community benefits across Epsom and Ewell Borough.
- 4.9. There are a number of policies of relevance to this application, as listed below;
- Policy DM8 Heritage Assets resists the loss of heritage assets and ensures their conservation and enhancement. The policy sets out that development proposals with a likely impact on Heritage Assets must establish the significance of the asset as part of the application process (please view attached Heritage Statement).
 - Policy DM9 Townscape Character and Local Distinctiveness states that planning permission will be granted for proposals that make a positive contribution to visual character and appearance in line with Conservation Area Appraisals. This includes compatibility with local character, surrounding the historic environment and inclusion of local features and materials.
 - Policy DM10 Design Requirements for New Developments ensures that development contributes to the character and local distinctiveness of an area. This includes the development typology, densities and key features such as roof forms, windows and building materials.
 - Policy DM12 Housing Standards specifies that all housing developments, including conversions, are required to comply with external and internal space standards.
 - Policy DM21 Meeting Local Housing Needs where the application is expected to provide evidence for its need as well as ensuring flexibility of development for future conversions etc.
 - Policy DM24 Employment Uses Outside of Existing Employment Policy Areas sets out that the loss of employment floorspace will only be granted where existing use has a significant adverse effect on residential amenity which cannot be alleviated and evidence that the site is no longer suitable for employment uses, through the marketing for a minimum of 18 months.
 - Policy DM37 Parking Standards specifies that development proposals, including redevelopments and conversions, have to demonstrate appropriate provision of off-street parking in line with Epsom & Ewell Borough Parking Strategy.

Supplementary Planning Documents

4.10. The SPDs of relevance to this application include;

- Sustainable Design SPD (Feb 2016) sets out to demonstrate a proposal's compliance with the Policy CS6 and ensures that applications are accompanied by a Sustainability Statement. The SPD encourages the consideration of sustainability elements in proposals, such as incorporating renewables, water/energy efficiency and measure to incorporate appropriate waste provision and reuse of recycled materials. And;
- Parking Standards for Residential Development SPD (Dec 2015) specifies the minimum parking standards for residential development across the borough (as seen in Table 4.1 below). As the site proposal is located just south of the Epsom Town Centre boundary, the proposal is expected to provide approximately 1 parking space per unit.

Type of Development	Epsom Town Centre	Elsewhere in the Borough
1 & 2 bedroom flats	0.75 spaces per unit	1 space per unit
3+ bedroom flats	1 space per unit	1.5 spaces per unit
1 & 2 bedroom house	1 space per unit	1 space per unit
3 bedroom houses	1 space per unit	2 spaces per unit
4+ bedroom houses	2 spaces per unit	3 spaces per unit

Table 4.1: Minimum Parking Standards for Residential Development

Emerging Planning Policy

- 4.11. EEBC is in the process of updating their Local Plan. The council are currently in Regulation 18 stage of the Local Plan expected to cover the plan period of 2017 to 2032. Adoption is not anticipated until the end of 2022. However it is likely that delays caused by the COVID-19 Pandemic in 2020 could lead to a pushed back adoption date to 2023.
- 4.12. In 2020, the Policy Team outlined their proposed strategy to deliver at least 579 net additional dwellings per annum over the Local Plan Period. This strategy seeks to prioritise and optimise potential sources of housing supply within the urban areas.
- 4.13. In accordance with the Local Development Scheme (LDS), the Regulation 18 (Part 2) Consultation was anticipated in May-June 2020, however, the LDC was produced prior to March 2020, and does not take into account the effects of Covid-19 on the Local Plan preparation process. As such, it is not yet known when EEBC intend to hold their next Local Plan Public consultation.

Five Year Housing Land Supply

- 4.14. The Council confirmed that they only have a 1 year supply of housing at the January Licensing and Planning Policy Committee Meeting. As the Council cannot demonstrate a five year housing land supply (5YHLS), the presumption in favour of sustainable development is engaged in the Borough.

Housing Delivery Test

- 4.15. The 2020 Housing Delivery Test (HDT)¹ identifies that the Council was required to deliver 1,519 new dwellings over the preceding three years. However, EEBC was only able to deliver 512 new dwellings, subsequently receiving a HDT test score of 34%.
- 4.16. In accordance with the NPPF, the Council is required to apply a 20% buffer to the housing supply in the Borough. They must also publish a Housing Delivery Action Plan to demonstrate how they are proactively working towards increasing housing delivery in Epsom and Ewell.
- 4.17. The poor precedent of housing delivery, and lack of a five year housing land supply in EEBC, demonstrates the distinct housing need in the Borough. This application will enable the development of four net additional dwellings and will contribute to need in Epsom.

¹ Further information on the Housing Delivery Test can be found at <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test>. Put simply, the HDT provides a measure of housing delivery based on the preceding 3 financial years. Paragraph 042 (ref ID: 68-042-20190722) outlines the penalties for under delivery

5. Planning Assessment

- 5.1. This section provides an assessment of the proposed development against the relevant Local and National planning policies.

Principle of development

- 5.2. Cedars Cottage is in a sustainable location within a short distance from the town centre, approximately 500m from the High Street and 650m from the train station. Therefore, it is in an accessible location from the town's shops and services. Additionally, a bus stop on Church Street, a short distance from the property, offers regular services to Epsom Hospital, Reigate, Crawley and Gatwick Airport. Future residents of Cedars Cottage will be well connected to sustainable modes of transport and local services.
- 5.3. Policy DM 24 Employment Uses Outside of Existing Employment Policy Areas states that development proposals in the Borough must demonstrate that the site is no longer suitable for its existing employment use.
- 5.4. Epsom and Ewell Borough Council East Street Office Demand Study (2013) provided a assessment of the demand and provision of office space across Epsom Town Centre. It demonstrated that the Epsom Office Market was not particularly strong compared to surrounding markets such as Leatherhead and Reigate and had seen "not much activity" (page 21: para 3.31).
- 5.5. The report further demonstrated, in Figure 3 (page 22) that the smaller office units below 185 sqm were the most popular. As Cedars Cottage is in excess of 185 sqm it is suggested that demand for offices of this size are not of particular demand in Epsom. Thus demonstrating that the site is not required in Employment uses.
- 5.6. Notably, Cedars Cottage was used as a residential property from the 17th Century until 1970/80, when it was converted in to a GP surgery, and later into offices in the 1990s. The buildings was not purpose built for use as an office. As such, it is cramped and unsuitable for modern use. The change of use to residential would return Cedars Cottage back to its original use, and facilitate the delivery of additional housing stock in EEBC.
- 5.7. According to EEBC Planning Committee's Five-Year Housing Land Supply Statement (2019)(5YHLS), only a one-year housing land supply can be demonstrated, which suggests significant need for residential dwellings in the borough. This proposal will provide four high quality homes on a deliverable site in a sustainable location in order to address the housing need in the borough.
- 5.8. This application demonstrates the best and most efficient use of an unsuitable and outdated offices, enabling the conversion to sensitively designed new flats, which are well suited to the immediate context and surroundings.

- 5.9. Policy DM22 Housing Mix specifies that permission will be granted for residential proposals that incorporate a mix of dwelling sizes. This proposal at Cedars Cottage offers both a 2 bed and one bed dwellings to a central location in the Epsom town centre.

Heritage Impacts

- 5.10. Cedars Cottage is a Grade II listed building, within close proximity of a number of listed buildings and is also located within Church Street Conservation Area.
- 5.11. Policy CS5 of the EEBC Core Strategy (2007) and Policies DM8 and DM9 of the Development Management Policies Document (2017) both highlight the importance of protection and enhancement of heritage assets and the “reinforcement of local distinctiveness” within the Conservation Area.
- 5.12. As previously mentioned, the proposals for Cedars Cottage will ensure the exterior elevations and appearance will be retained. The traditional exterior of the Grade II listed property will remain the same to ensure that the proposal leads less than substantial harm to the character of the Church Street Conservation Area.
- 5.13. As demonstrated in the appended Plans, Elevations and Heritage Statement, this proposal has been designed sympathetically to the wider surroundings and will maintain the existing exterior characteristics which reflect the Church Street Conservation Area. Whilst the proposal makes provision for internal alterations to the property, it will retain the external materials, properties and appearance of the existing dwelling and will not result in any adverse impacts to the wider character of the Conservation Area.
- 5.14. The development proposal has been sympathetically designed in careful consideration of these heritage assets. As such, the proposed scheme has retained the footprint, exterior appearance and scale to safeguard the setting of heritage assets.
- 5.15. In principle, returning the listed building to its original residential use will help to preserve its significance.

Design and Layout

- 5.16. Policy DM10 states that development proposals will be permitted where they contribute to and respect the character and distinctiveness of a street or area. The proposed dwellings are generously proportioned, especially when considered against the space standards as set out in the Technical Housing Standards Nationally Described Space Standards (2015).
- 5.17. This proposal has been carefully considered and seeks to retain the external appearance of the Cedars Cottage. The conversion to residential uses is well suited to the wider context and character of Church Street, in accordance with Policy DM10 of the adopted Plan.
- 5.18. The proposal has been designed in careful consideration of neighbouring residential amenity and privacy, retaining the tree lining along the boundary of Cedars Cottage to provide suitable screening and safeguard the privacy of future and existing residents.

Access and Parking

- 5.19. The proposed development will retain the existing gravel driveway at the front of the property with the approximate capacity for 8 vehicles. This satisfies the minimum parking requirements, as set out in the Epsom and Ewell Parking Standards SPD (Table 4.1), and will provide sufficient parking for future residents.
- 5.20. Additionally, the provision of parking within the curtilage of the site offers a suitable location to ensure parked vehicles are not an obstruction to other road users or cause parking pressures elsewhere, in line with Policy DM37.
- 5.21. Refuse and servicing to the property will be via existing access using a similar arrangement that of the existing building uses.

Flood Risk and Drainage

- 5.22. The development site is located within Flood Risk Zone 1. Therefore this is policy compliant as Policy CS6 that directs development to Flood Zone 1 areas to avoid increased risk of flooding in the Borough.

6. Conclusion

- 6.1. EEBC cannot currently demonstrate a 5YHLS, when considered alongside their poor precedent of housing delivery, it is apparent that there is a clear and distinct housing need in the Borough. This is amplified in the emerging Local Plan, which is currently being developed on the basis that it will deliver at least 579 net additional dwellings per annum, a considerable uplift from the currently adopted figures.
- 6.2. This proposal will enable the development of four new dwellings within a sensitive conversion of a Grade II Listed building. This will enable the efficient use of land within the built up area and will facilitate the development of sustainably located new housing provision in the Borough.
- 6.3. Notably, the existing office uses are unsuitable for the demands of modern office culture. In accordance with Policy DM24, there is not the demand for office floor space, above 185 sqm, in Epsom Town Centre to necessitate the retention of Office Uses in this location.
- 6.4. This proposal returns the Grade II listed building back to its original use and is an appropriate reflection of the surrounding residential area. The proposal ensures the preservation and best use of a heritage asset, returning the building to its former use and enabling an appropriate and sensitively designed conversion to suit modern demands.
- 6.5. This application demonstrates the best and most efficient use of an unsuitable and outdated office space, enabling the conversion to sensitively designed new flats, which are well suited to the immediate context and surroundings.
- 6.6. The proposal is compliant with Local and National Planning Policy, and represents appropriate development within the Conservation Area. As such, this proposal will not result in any adverse impacts that would significantly or demonstrably outweigh the benefits when assessed against relevant policies.

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