



MEK Town Planning and Design
Consultants Ltd

Mr Moses Ekole

14 Clive House, Haddo Street,
SE10 9RH

Tel: +44 7506208449

<https://www.mektownplanningconsultants.co.uk>

mosesekole@gmail.com

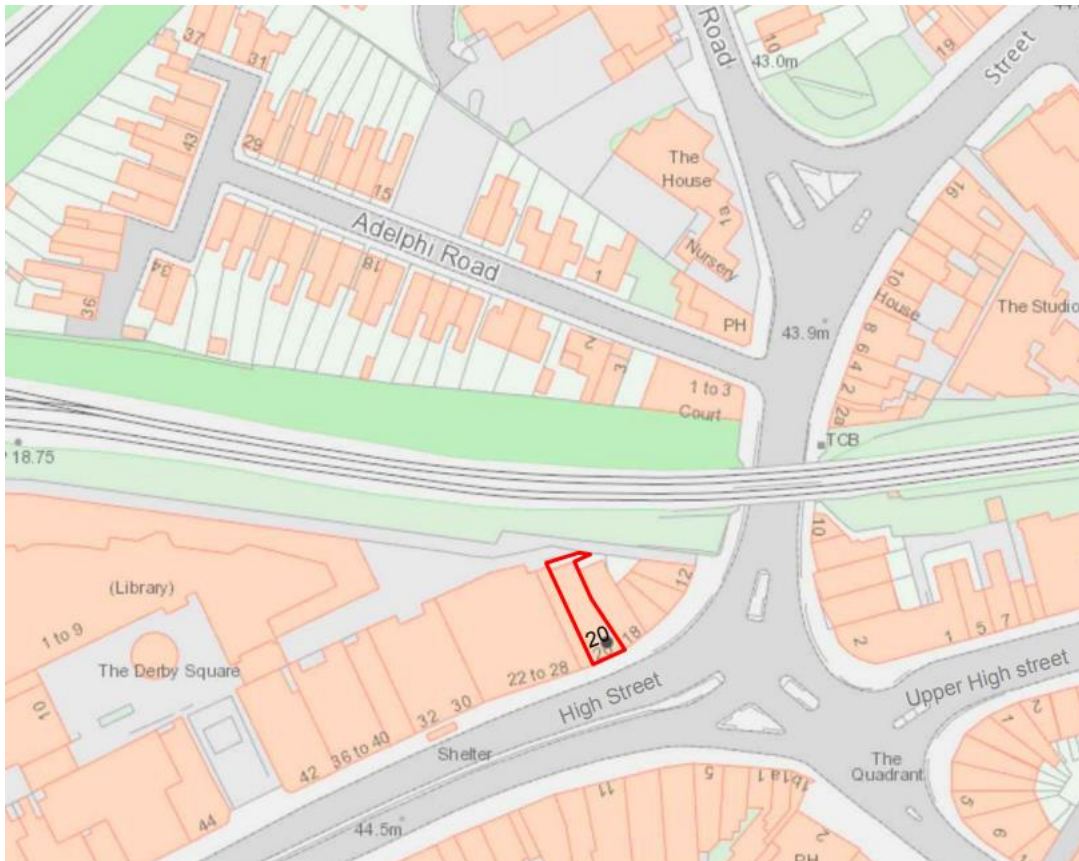
PLANNING AND HERITAGE STATEMENT

For

Creation of 2 x studio flats at first and second floor levels with associated bin storage and bicycle facilities.

at

20 High Street, Epsom, KT19 8AH



Date: 12th October 2023

Our Ref: 20HSK/01



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mosesekole@gmail.com

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APPENDIX 1: PHOTOGRAPHS OF THE SITE

1.0. BACKGROUND CONTEXT AND INTRODUCTION

- 1.1. MEK Town Planning and Design Consultants Ltd has been instructed by the applicant to produce this planning statement to accompany an application for full planning permission to change the use of the property to 1 x studio flat at first floor and 1 x studio flat at second floor level with associated bin storage and bicycle facilities at 20 High Street, Epsom, KT19 8AH. The application is submitted to the Epsom Ewell Borough Council.
- 1.2. This document includes heritage statement and it must be read in conjunction with the associated drawings which form part of this application submission.
- 1.3. The application is accompanied with the following drawing numbers:
 - V08-1: Floor Plans (Existing and Proposed Ground and First Floor Plans)
 - V08-2: Existing and Proposed Second Floor Plans.
 - V08-3: Existing and Proposed Front Elevations.
 - V08-4: Existing and Proposed Rear Elevations.
 - V08-5: Existing L.H Side Elevation (No Changes Proposed).
 - V08-6: Existing R.H Side Elevation (No Changes Proposed).
 - V08-7: Existing and Proposed Site Plan.



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- Location Plan.
- Heritage Statement.
- CIL Form

1.4. The statement will set out the description of site and its context; relevant planning history; description of the proposed development; relevant planning policies; main issues and considerations which includes heritage matters, summary, and conclusions.

2.0. DESCRIPTION OF SITE AND CONTEXT.

2.1. No 20 High Street is a three -storey property consisting of ground floor, first and second floor levels. The ground floor is currently in use as a chicken shop/restaurant falling within use (class E) with ancillary storage/warehouse space at first and second floor levels. The application seeks to convert the first and second floor levels to create two studio flats.

2.2. There is a yard at rear which is currently used for placing bin storage and recycling facilities and access is well established at rear for waste collecting vehicles. There is also well-established public footpath and bicycle path at rear.

2.3. The site is within the Epsom Town Centre and Epsom Town Centre Conservation Area.

3.0. RELEVANT PLANNING HISTORY.

- 23/00304/COND | Approval of Details of Conditions 3 (effective control of fumes and odours), 4 (treatment of all air conditioning plant and machinery against the transition of sound) and 5 (refuse storage and recycling facilities) of Planning Permission 22/00266/FUL, dated 22 July 2022 – Details approved 27th July 2023.
- 22/00266/FUL | Change of use from Class E(a) (Retail) to E(b) (Restaurant) and Sui Generis (Takeaway) at ground floor with extract canopy to rear and re-painting of existing shopfront – Approved 22nd July 2022.



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4.0. DESCRIPTION OF THE PROPOSED DEVELOPMENT.

4.1. Planning permission is sought for the conversion of first floor and second floor office/storage into 2 x studio flats.

4.2. The design of the layout is described below:

- First floor studio flat:
 - Gross Internal Area (GIA) of 55.53m².
 - Open plan layout design.
 - Existing windows to the front and rear elevations to be retained.
 - Storage of 3.44m²
 - Shared access steps from ground floor level.
 - Bin facilities located at ground floor rear.
 - Bicycle parking space located at ground floor rear.

- Second floor studio flat:
 - Gross Internal Area (GIA) of 41.33m².
 - Open plan layout design.
 - Existing windows to the front and rear elevations to be retained.
 - Inbuilt storage included
 - Shared access steps from ground floor level.
 - Bin facilities located at ground floor rear.
 - Bicycle parking space located at ground floor rear.

5.0. RELEVANT PLANNING POLICY.

5.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise'.

5.2. The development plan for Epsom Ewell Borough Council comprises the National Planning Policy Framework (NPPF) July 2021; the Core Strategy 2007, the Development Management Policies Document 2015 (DMPD); Epsom Town Centre Area Action Plan 2011 (Plan E).



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5.3. Other relevant documents include:

- Parking Standards for Residential Development – 2015.
- Surry County Council Vehicular and Cycle Parking Guidance -2018.
- Epsom Town Centre Character Appraisal.
- Epsom Town Centre Area Action Plan.
- Technical Housing Standards – National Described Space Standards 2015.

Table 1. Minimum gross internal floor areas and storage (m²)

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
1b	2p	50	58		1.5
2b	3p	61	70		2.0
2b	4p	70	79		2.0
3b	4p	74	84	90	2.5
3b	5p	86	93	99	2.5
3b	6p	95	102	108	2.5
4b	5p	90	97	103	3.0
4b	6p	99	106	112	3.0



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6.0. MAIN ISSUES AND CONSIDERATIONS.

- The Principle of Residential Development
- Quality of Residential Accommodation.
- Impact on Character and Appearance.
- Heritage/Conservation Area.
- Impact on Living Conditions for Neighbours.
- Car Parking and Access.
- Cycle Parking Provision.
- Refuse and Recycling Facilities.

6.1. THE PRINCIPLE OF RESIDENTIAL DEVELOPMENT

- 6.1.1. Planning permissions is sought to create two studio flats at first and second floor levels of a property at no.20 High Street. The site is located within the built-up area of Epsom Town Centre where residential accommodation is broadly at upper floor levels with commercial uses at ground floor levels as such the proposal to introduce residential development at upper floor levels in this location is acceptable in land use terms.
- 6.1.2. The location of the site is highly sustainable with public transport connection links within the proximity, shopping, social or recreation facilities within walkable distance. The surrounding area is therefore appropriate for a residential development of the nature proposed.
- 6.1.3. Paragraph 11 of the National Planning Policy Framework (NPPF) stipulates that, development proposals which accord with an up-to-date development plan should be approved and where a proposal conflicts with an up-to-date development plan, permission should not usually be granted. The Epsom Ewell Borough Council does not have an up-to-date development plan on account of not being able to demonstrate a five-year supply of housing alongside the Local Plan being out of date. In that context, paragraph 11 should therefore be engaged as the Council's policies which are most important for determining the application are out-of-date.
- 6.1.4. Paragraph 60 of the NPPF aims to significantly boost the supply of homes in areas where it is needed and addressing specific needs. Policy CS7 of the Core Strategy seeks to meet housing requirements in accordance with Policy H1 of the South East Plan which is at least 2,715 homes within the period 2007-2022 (which has elapsed)



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or 181 new dwellings per annum. Policy E2 of Plan E also states that new development will deliver at least 635 units within the Town Centre between 2010-2026.

- 6.1.5. The NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of supply against housing requirements. However, Epsom & Ewell Borough Council is presently falling significantly short of this requirement and cannot presently demonstrate five years housing land supply. In that context and in the absence of an up-to-date Local Plan, the net provision of the two studio residential units/flats at the site would weigh significantly in favour of the development.
- 6.1.6. In addition, paragraph 86(f) of the NPPF advises that, residential development often plays an important role in ensuring the vitality of centres and encourages residential development on appropriate sites. Policy E1 of the Epsom Town Centre Area Action Plan states that within the town centre high-density residential housing is in principle acceptable. Accordingly, the provision of additional housing in form of studio flats in this sustainable location is supported in principle and this weighs in favour in the titled balance; subject to the proposal satisfactorily meeting the objectives of the other policies in the Core Strategy, the DMPD including the guidance within the SPDs and supporting documents as discussed in the next sections of this statement.

6.2. Quality of Residential Accommodation.

- 6.2.1. Paragraphs 130 and 157 of the NPPF, Policy CS6 of the Core Strategy and Policies DM10 and DM12 of the DMPD aim for a functional, adaptable, and sustainable design, with a high standard of amenity, including with respect to layout, orientation, and massing.
- 6.2.2. The units are dual aspect, with a front elevation fronting onto High Street and a rear elevation opening towards the south east where there is good access to sunlight and cross ventilation. The windows will be adapted to appropriate acoustic levels to mitigate against potential traffic and rail noise corridor to the front and rear respectively. The applicant is happy for a condition to be attached on the decision notice if this is deemed appropriate, relevant and necessary by the local planning authority.
- 6.2.3. In terms of Gross Internal Areas (GIA): The Nationally Described Space Standards 2015 sets out internal space standards for new dwellings at a defined level of occupancy. The single occupancy 1 bed unit (Unit 1) must have at least 39m² of internal floor space with a built-in storage of 1.0m².



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6.2.4. The Gross Internal Area of the Studio Flat at first floor would be 55.53 sqm with in-built storage area of 3.44m². The Studio Flat at second floor level would be 41.33m² with in-built storage area of 1m². The proposals would therefore comply with national space standards in terms of GIAs. In addition, the proposals make the use of the existing building, the living/circulation spaces are of an ample size and outdoor recreation areas are within walkable distance from the site, the units are all dual aspect and south facing thus providing good internal amenity. In light of that, the proposals would provide two studio flats of high-quality residential accommodation in this sustainable location.

6.3. Impact on Character and Appearance.

6.3.1. The proposal to create two studio flats at first and second floor levels follows the prevailing pattern of similar developments in this locality. This is because, there are plenty of residential developments on the upper floor levels of properties along the High Street and wider Town Centre area of Epsom. In addition, the proposal makes the best use of the site to deliver the much need form of residential development without causing any external changes to the external appearance of the host building.

6.3.2. In light of that, and given that, the surrounding area is mixed in character consisting of a diversity of land uses which include residential and commercial uses, the proposed development would add on to that diversity whilst making a valuable contribution to the distinctiveness of this Town Centre and surrounding townscape. The proposal would therefore be in keeping with the prevailing character and appearance of the surrounding townscape and would not be in conflict with the aims of Policies CS5 of the Core Strategy, Policies DM9, DM10 and DM14 of the DMPD.

6.4. Heritage/Conservation Area.

6.4.1. The proposal seeks to create two studio flats on the upper floors (first and second floors) without making significant physical alterations to exterior or appearance of the host building. The site is within Epsom Town Centre Conservation Area and it is also within an area which is designated as an Archaeological Site. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to the desirability of preserving or enhancing the character or appearance of that area.

6.4.2. Paragraphs 197-202 of the NPPF requires consideration of the harm to the significance of a designated heritage asset. Paragraph 200 requires clear and convincing justification where there is harm to or the loss of a designated heritage asset.



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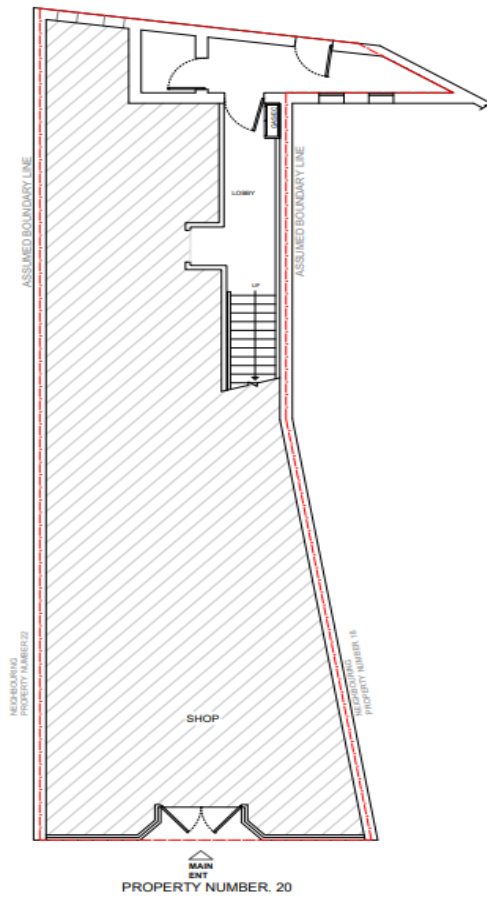
mosesekole@gmail.com

- 6.4.3. Paragraph 202 states that where there is less than substantial harm, the harm must be weighed against the public benefits. Policy CS5 of the Core Strategy and Policy DM8 of the DMPD seek to protect and enhance heritage assets and their setting.
- 6.4.4. Epsom developed as a spa resort from the end of the 17th century and has a high number of listed buildings. Many of these buildings have historic shopfronts which reflect this period of development. It is understood that, during the late 19th and early 20th century the High Street continued to expand and be redeveloped which led to the construction of the buildings which form the focus of this application. These consist of a neo-Georgian shopping parade of high architectural quality. The Conservation Area appraisal notes the following:
- *“Architecturally, the shopping parades and terraces on both sides of the High Street and Upper High Street are handsome and distinguished buildings; the homogeneity of Nos. 12 - 64 High Street is what gives this part of the High Street its distinctive character”*
- 6.4.5. This demonstrates that no.20 High Street (the application site), forms an important part of the Conservation Area, making a strong contribution to its character and appearance through its high-quality architecture. Key elements of this include its fenestration, window reveals, use of materials, traditional roof form, symmetrical form and pediments which help break up the massing of the structure as a whole. The appraisal notes the building makes a positive contribution to the character and appearance of the Conservation Area.
- 6.4.6. The proposal would create new small residential units by making alterations to the design of the existing internal layout. The new internal layout would be of an open plan arrangement which would ensure compliance with acceptable layout design for studio flats. The internal alterations are required to achieve the open plan layout; however, these internal works would neither require planning permission nor cause any visual harm to the appearance of the building or conservation area.
- 6.4.7. The proposal would however make minor external changes to the cycle and bin storage area at ground floor rear elevation. The alterations in this area will include the introduction of external door which would create a separate access for the restaurant/takeaway kitchen at ground floor level to the rear part of the building. The existing door would also be replaced with a window and new external door opening would be introduced to provide access to the bin and bicycle storage area. This is demonstrated on the layout plans below:

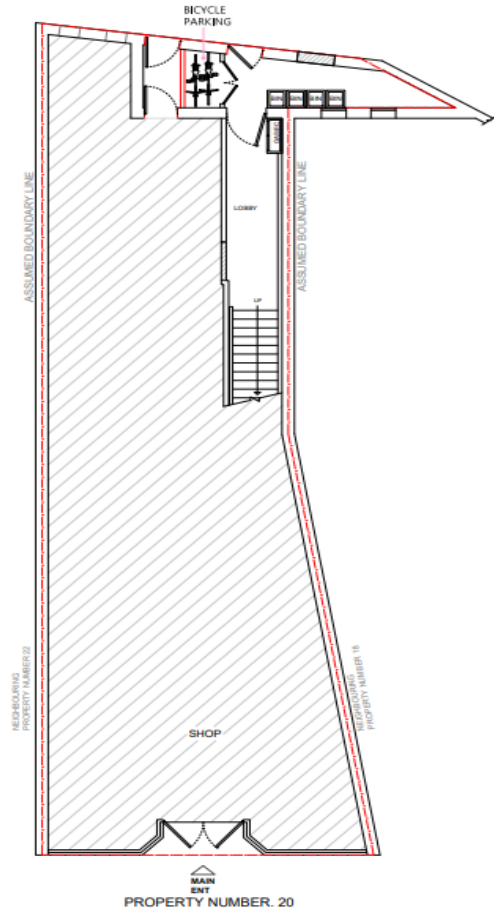


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① **GROUND FLOOR - EXISTING**
1:100



② **GROUND FLOOR - PROPOSED**
1:100



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9 REAR ELEVATION - EXISTING
1:100



10 REAR ELEVATION - PROPOSED
1:100

6.4.8. Those physical external changes are not visible from broader public views or wider conservation area. It is noted that, the new doors may be visible in views from the rear public footpath, however, those views would be to the limited extend and are considered to be visually insignificant. It should be brought to your attention that, the Conservation Area Appraisal document advises that, “the rear of the building is of less interest, but its flank elevation is visible from the highway and from a narrow public footpath which runs between this building and the railway line.

6.4.9. The proposed modest physical alteration works are located to the rear ground part of the host building which is considered to be of less interest in heritage terms. The harm arising from those external works particularly in some views from the rear footpath would cause less than substantial harm to the host building and the character and appearance of this part of the conservation area would be preserved. In addition, due to the nature of the proposed development and its modesty, there would be no potential effect to the assets of any archaeological significance. In that context, the development would comply with Policy DM8 of the DMPD and Policy CS5 of the Core Strategy which seek among other things, to protect and enhance heritage assets and their setting.



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6.5. Impact on Living Conditions for Neighbours.

6.5.1. The proposals by their nature and siting in relation to neighbouring boundaries would not cause harm to the living conditions of neighbouring occupiers in terms of sense of enclosure, loss of light and sunlight, privacy and overlooking, outlook and noise. In addition, the design of the layout and windows would also ensure acceptable relationship between the proposed two studio flats in no-way to cause harm to living conditions of any future occupiers. In that context, the proposals would comply with Policies CS5 and CS6 of the Core Strategy and Policy DM10 of the DMPD which seek to protect occupants and neighbour amenity from the effect of development or noise from surrounding area.

6.6. Car Parking and Access.

6.6.1. This application property does not have car parking provision; however, it is situated in a highly connected and sustainable location within Epsom Town Centre. Public transport which includes several bus routes and trains for onward journeys is in proximity to the site and would be available as one of optional transport modes for any future occupiers of the development in terms. There are also plenty of public car parking facilities in the proximity of the site which provide further optional transport modes to future occupants. The site has established access from the existing rear footpath as demonstrated on the submitted layout plans.

6.6.2. Policy CS16 of the CS encourages an improved and integrated transport network and facilitates - a shift of emphasis to non-car modes as a means of access to services and facilities. Policy DM37 of the DMPD and the Parking Standards for Residential Development SPD specify a minimum requirement for four parking spaces across the development.

Table 1: Minimum Parking Standards for Residential Development

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 houses	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



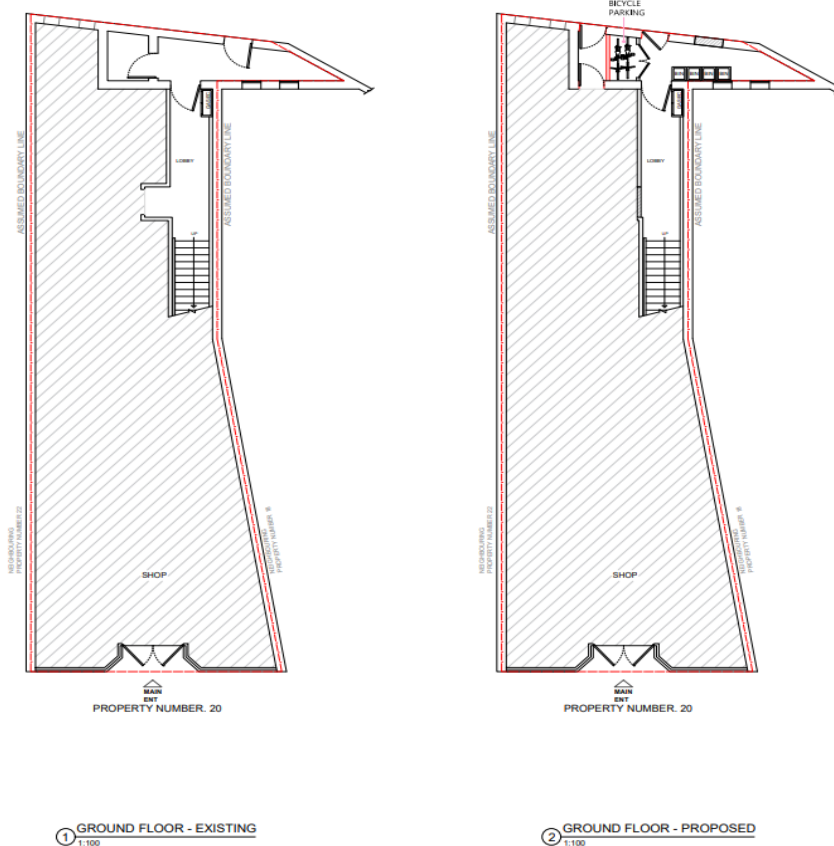
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6.6.3. The proposed studio flats would be car free development as no car parking spaces are proposed. The density in terms of occupancy per unit being 1 person would generate limited net journey trips which would be accommodated by the existing excellent sustainable transport links on account of its town centre location. In addition, the Parking Standards for Residential Development SPD do not specify any car parking requirements for studio flats. In that context therefore, the non-car parking provision is considered appropriate and acceptable in principle at this town centre location, and would therefore be in accordance with the aims of Policies CS16 of the Core Strategy, Policy DM37 of the DMPD and the Parking Standards for Residential Development SPD.

6.7. Cycle Parking Provision.

6.7.1. The development makes provision of 1 cycle parking spaces for each studio flat. These would be located in a secure store as demonstrated in the proposed ground floor layout plan. The cycle parking provision is considered acceptable in accordance with the requirements of Policy DM37 of the DMPD.





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6.8. Refuse and Recycling Facilities.

6.8.1. Bin storage area for the proposed two studio flats is provided towards the rear of the ground floor as demonstrated on the submitted layout drawings. Four wheelie bin facilities are proposed and would be a 240L and includes for food waste. The scale of bin facilities provided are considered proportionate to the modest occupancy rates of the proposed residential units. The location of the bin store is appropriate in terms of future resident's access.

6.8.2. Clarification: the ground floor restaurant/takeaway been storage and recycling area is located within the communal bin store yard at the rear of the application property. The yard at rear is used by commercial land uses on this part of the high street for placing commercial bin storage and recycling facilities. The commercial element at ground floor of the application property has a dedicated space for its commercial bins and storage area there. Access is well established at rear for waste collecting vehicles. The provision of bin storage and recycling facilities for the two studio flats is well separated from the commercial operations at ground floor.





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6.8.3. In terms of access by collection vehicles, this would be via the established vehicular access to the rear of the host building. In that context, the location of bin facilities at rear is considered appropriate for easy access by collection vehicles. The bin facilities would be pulled out on the collection where collection vehicle would easily pick them up. There is no vehicular traffic to the rear access as such there would be no risk of obstructing traffic. The impact upon the highway and public footpath at rear would therefore not materially be different from the existing situation. The proposal would therefore comply with Policy CS6 of the Core Strategy and Annex 2 of the Sustainable Design SPD.

7.0 SUMMARY AND CONCLUSION

7.1 Planning permission is sought for the creation of two studio flats to the upper floor levels being first and second floors. The assessment within this document has established that, the proposal is acceptable in principle and all the other material consideration have been appropriately satisfied.

7.2 The proposed development would make a meaningful contribution towards delivering the Council's housing target within a highly sustainable location and would therefore be consistent with the Framework and Council policy in so far as it seeks to significantly boost the supply of homes. This benefit should be given significant weight in the planning balance in favour of the proposal.

7.3. There is an appropriate level of social benefit arising from the provision of small units of residential accommodation as proposed. The development makes use of existing building to provide this much needed housing type without making significant changes to the exterior of the building or undertaking any excavation works. In addition, its town centre location would ensure the development is car free with cycle parking provision which would promote sustainable travel options for future occupiers of this new units. This would deliver significant environmental benefits that would work in favour of the proposed development in line with the advice contained within the NPPF. The identified less than substantial harm arising from the proposed development would be outweighed by those public benefits.

7.4 In conclusion: on account of the tilted balance being applied in this case, the benefits of the town centre housing would clearly outweigh the harm to the conservation area. The modification and discreet external alterations to the fenestration at rear ground floor level would tip the balance in favour of a positive recommendation for approval with conditions where necessary and relevant to the scheme. The proposal complies



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with the development plan for Epsom and Ewell Borough Council and it should therefore merit approval in your planning decisions on those grounds.

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