

Planning & Heritage Statement

(including Design & Access and Flood Risk Considerations)

9 Corner House Parade, Epsom Road, Ewell, KT17 1NX

January 2024

PD Planning UK Ltd, 2024

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1. Introduction

- 1.1. This Statement is written to support a planning application for a replacement shopfront and alterations to a rear flue extract on this commercial property. It provides the background and rationale to the proposal and it incorporates a consideration of relevant heritage matters.

2. The Site, Historic Description and Context

- 2.1. The application property is located on the south-eastern side of Epsom Road, to the south of its junction with Ewell House Grove and Reigate Road.



Figure 1 - Aerial view of the site and streetscene view (Google Maps)

- 2.2. The property comprises a mid-terrace, ground floor commercial unit, occupied as a Class E restaurant/cafe. The corner terrace building comprises a series of similar ground floor

commercial units typical of a suburban shopping parade with 2 floors of residential accommodation above, accessed from the rear of the building.

- 2.3. The building is of brick construction with a pitched tiled roof, and “Tudorbethan” style detailing on prominent gable features within the front elevation. The shopfronts to the ground floor commercial units are varied in form and appearance, using different materials and colours, and entrances and window displays have been adapted over the years to accommodate the needs of the various commercial uses.
- 2.4. The property is within the Ewell Village Conservation Area, but it is not a Listed building, nor are there any listed buildings in the vicinity of the site that are affected by the development.

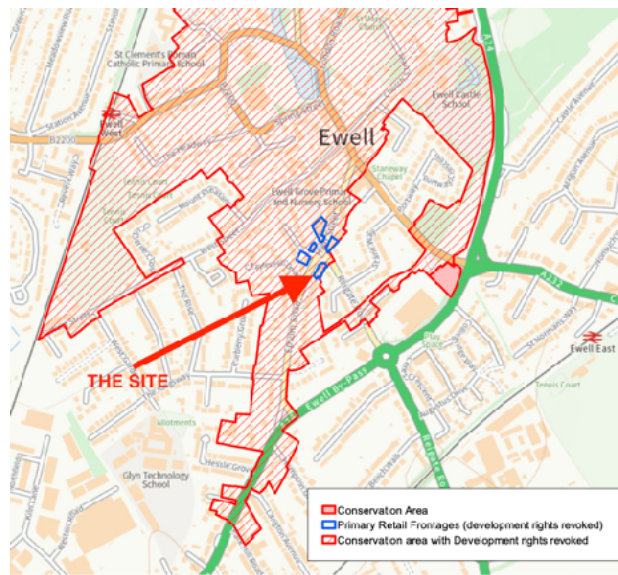


Figure 2 - The site and its location within the Ewell Village Conservation Area (Epsom & Ewell Borough Council)

- 2.5. The Ewell Village Conservation Area was designated in 1972. Epsom & Ewell Borough Council’s Character Appraisal and Management Proposals (CAMP) document (August 2009) acknowledges its special characteristics, identifying five areas of distinct character.
- 2.6. The site is within the village centre, identified in the CAMP as sub-area 3. The property is identified in the CAMP as a “well detailed Inter-War development” making a positive contribution to the historic character of the conservation area.



Figure 3 - Photograph extract from the CAMP (Epsom & Ewell Borough Council)

3. Relevant Planning History

3.1. The property has the following planning history:

- 02/01307/ADV - In 2002, advertisement consent was given for the installation of a projecting sign.
- 05/01305/FUL - In 2005, planning permission was granted for the erection of a single storey rear addition and internal alterations to accommodate refrigeration units.
- 15/00168/TFCOU - In 2015, planning permission was granted a temporary flexible change of use from Class A1 to A3.
- 21/00784 - In 2021, planning permission was refused for the erection of raised decking and boundary treatment.

4. The Proposal

4.1. The application seeks planning permission for the retention of the recently installed shopfront and modifications to the ducting at the rear of the property.



Figure 4 - The former and current shopfronts, and current rear ducting

4.2. The development is evident from a site inspection, although the submitted plans also clarify the extent of the works.

5. Heritage Considerations

Heritage Legislation, Policy and Guidance

5.1. The 2023 National Planning Policy Framework (NPPF) Part 16 requires heritage assets to be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Paragraph 200 requires an applicant to “describe the significance of any heritage assets 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.”

- 5.2. NPPF Paragraph 205 states *“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”*.
- 5.3. NPPF Paragraph 208 confirms 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.*
- 5.4. EEBC’s Policies CS5, DM8 and DM9 refer to heritage assets, confirming the Council’s similar approach to heritage assets as that expressed in the NPPF.

Historic Context

- 5.5. The site description above considers the site in its current context, and its historic and architectural significance. The relevant heritage asset for the purpose of this application is the Ewell Village Conservation Area.

Assessment of Significance

- 5.6. English Heritage’s 2008 “Conservation Principles” confirm that there are four main categories of significance of heritage assets:
 - iii Exceptional – an asset important at the highest national or international levels, including scheduled ancient monuments, Grade I and II* Listed buildings and World Heritage Sites.
 - iii High – a designated asset important at a national level, including Grade II listed buildings and locally designated conservation areas. The NPPF advises that substantial harm should be exceptional.
 - iii Medium – an undesignated asset important at local to regional level, including buildings on a Local List (non-statutory) or those that make a positive contribution to a conservation area. This may also include less significant parts of listed buildings.
 - iii Low – structures or features of very limited heritage value and not defined as a heritage asset. Includes buildings that do not contribute positively to a conservation area and also later additions to listed buildings of much less value.
- 5.7. On this basis, the heritage asset relating to the proposal can be considered to be of medium to low significance. The building is within the Conservation Area but the ground floor shopfront and rear parts of the building are of limited architectural value and are not fundamental to the purpose or reasons for the designation of the Conservation Area.

The Impact on the Conservation Area

- 5.8. The shopfront is considered appropriate to the building. The shopfronts throughout the parade do not have any uniformity in terms of the entrance arrangements, detailed design and materials. The new shopfront does not therefore impact on the character of the shopping parade. The impact of the proposal on the significance of the Conservation Area will therefore be minimal and no harm will arise in this respect.
- 5.9. The ducting at the rear of the premises is not visible from the public domain and it is consistent with other commercial structures, stores and equipment typically found at the rear of commercial premises. It therefore has no impact on the significance of the Conservation Area.

Conclusion on Heritage Impact

- 5.10. The proposal will preserve the special architectural and historic interest of the Conservation Area and no harm will be caused to its significance. There are also benefits to the proposal in that it ensures the continued use of the property as a commercial unit, the shopfront improves visibility into the shop contributing to the vitality and viability of the shopping parade, and it improves the thermal and energy efficiencies of the building thereby resulting in a reduction in carbon dioxide emissions and fuel bills.

6. Main Planning Considerations

- 6.1. Aside from the heritage impact, other planning considerations are addressed below in the context of the 2021 National Planning Policy Framework (NPPF) and the Epsom & Ewell 2007 Local Plan Core Strategy (CS) and 2015 Development Management Policies Document (DPD).

Design and Appearance

- 6.2. The NPPF emphasises the need for high quality design which contributes positively to local character. EEBC Policies DM9 and DM10 encourage high quality design. EEBC's 2012 Shopfront Design Guide SPG is also of some relevance, albeit somewhat out-of-date.
- 6.3. As confirmed in the heritage considerations above, the design and appearance of the shopfront is acceptable in the context of the shopfronts in the remainder of the building. Notably the more prominent corner units of the building have aluminium framed shopfronts of similar form, with additional blanked out windows that do not offer an insight into the shops or contribute to maintaining an active frontage within the parade. The shopfront as installed allows for good views into the shop creating an active frontage, the centrally placed front door allows for level access into the shop, and the grey aluminium frame complements the grey framed windows and black detailing of the residential accommodation above. It therefore has a positive effect on the vitality and viability of the shopping parade, more so than its predecessor.

- 6.4. The ducting at the rear of the building is not visible from the public domain and its design and appearance is consistent with ducting arrangements that are often found on commercial properties of this nature.

The Impact on Neighbouring Properties

- 6.5. NPPF Paragraph 191 states that new development should be appropriate for its location and take into account the likely effects of pollution on health and living conditions. EEBC Policy DM10 supports development that maintains the amenities of neighbouring properties.
- 6.6. The shopfront does not have any impact on the amenities of neighbouring properties.
- 6.7. The rear ducting has been sited and installed to ensure that noise, vibration and fumes do not impact on the amenities of nearby properties. Appropriate measures can also be imposed by means of condition to ensure that this remains the case for so long as it remains in existence.

Parking and Highway Safety

- 6.8. The development does not have any impact on or affect matters relating to parking and highway safety.

Flood Risk and Sustainable Drainage

- 6.9. NPPF Paragraphs 173-175 refer to flood risk and the need to ensure development is not placed in areas at risk of flooding, and that new development does not increase flood risk elsewhere. EEBC Policies CS6 and DM19 seek to manage flood risk, site water management and surface water attenuation.
- 6.10. The property is within a Flood Zone 1¹ with a very low probability of flooding and a less than a 1 in 1000 annual probability of flooding occurring from the sea or a river. A property within a Flood Zone 1 area remains suitable for all types of development and uses.
- 6.11. The Environment Agency's Surface Water Flood (SWF) Map confirms that the property is at low risk of flooding from surface water, with a 3.3% chance (per year) of flooding from surface water as a result of heavy or prolonged rainfall.

¹ Environment Agency Flood Map for Planning 2024

High Risk Scenario - 1 in 30 (3.3%) annual probability of flooding
 Medium Risk Scenario - 1 in 100 (1%) annual probability of flooding
 Low Risk Scenario - 1 in 1000 (0.1%) annual probability of flooding

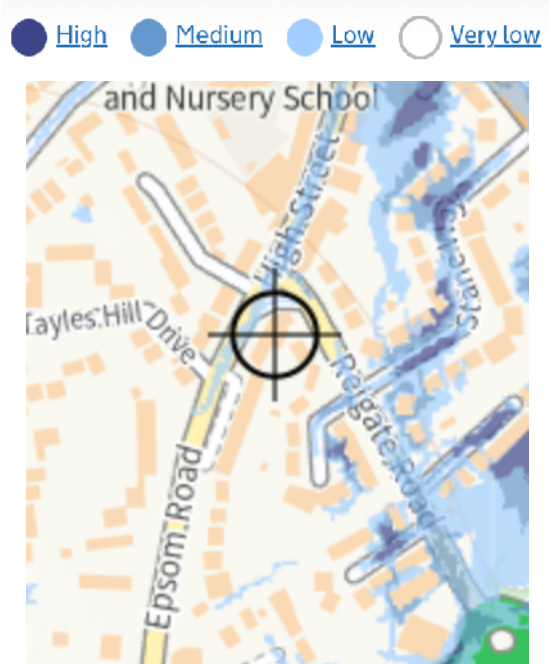


Figure 5 - Extent of flood risk from surface water
 (Environment Agency Flood Risk Map)

- 6.12. NPPF Guidance ² confirms that minor developments are unlikely to raise significant flood risk issues unless they would:
- 💧 have an adverse effect on a watercourse, floodplain or its flood defences;
 - 💧 would impede access to flood defence and management facilities; or
 - 💧 where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows.
- 6.13. The proposal is limited to a shopfront installation and extract ducting, and it will not give rise to any significant flood issues. The flood risk to the application site and the neighbouring properties will not therefore increase as a result of the development. The proposal will comply with the flood risk and drainage requirements of the NPPF and the EEBC Local Plan. There are no flood risks or potential for significant impact in surface water run-off associated with this development and no specific mitigation measures are required.

7. Conclusion

- 7.1. This Statement has been prepared in accordance with the planning and historic environment policies contained within the NPPF and the EEBC Local Plan.

² Technical Guidance to the National Planning Policy Framework (March 2012), Paragraph 10.

- 7.2. The development will not cause any harm to the significance of the Conservation Area. Even if “less than significant” harm is considered, then there are benefits to the proposal in that it will allow the continued commercial use of the premises that contributes to the vitality and viability of the local shopping parade. It also improves the thermal and energy efficiencies of the building.
- 7.3. The development is appropriate to the building and its context. There will be no adverse impact on the amenities of the adjoining occupiers. There will be no impact on flood risk to or from the property.
- 7.4. There are no matters of concern to which planning conditions cannot be reasonably applied, and it is therefore respectfully requested that Planning Permission be granted, subject to appropriate conditions as may be deemed necessary.

end.