

# FRIARS GARTH, EPSOM

# **PLANNING, DESIGN, ACCESS AND HERITAGE STATEMENT**

Rev 03 dated 11.03.2024

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**PRA**

[www.philiproyarchitecture.com](http://www.philiproyarchitecture.com)

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Prepared by Philip Roy Architecture

**PRA**

# 1.0 Introduction and Planning Statement

This Planning Design Access and Heritage Statement has been prepared on behalf of our client and applicant.

The applicant seeks for an additional floor to the previous planning approved scheme to hold 3 additional apartments.

PRA - Philip Roy Architecture

We specialise in custom designs with our goal being to enhance the way people interact with the spaces they spend the most time in. We are passionate about innovative and thoughtful architecture.

Our designs imbue beauty, flexibility, and purpose.

We are intuitive, enthusiastic, energetic and always maintain the clients vision at every step of the architectural process to create special projects that exceed expectations.

Our skills lie in our ability to rigorously research, explore, develop and visualise our design proposals. We take care to develop our designs in collaboration with our clients and consultants, and ensure that we communicate our ideas in the most appropriate manner.

PRA makes use of the latest design and modeling technology along with having a deep understanding of the building process including a thorough understanding of legislative and technical requirements for all types of sectors.

We are fortunate to be connected with a strong network of consultants and collaborators, providing strength and depth to every step of the architectural design.

PRA has worked on numerous schemes within Epsom and Ewell Borough Council along with national architectural home awards we continue to seek appropriate design.

## PLANNING STATEMENT

PROVIDED BY MR ROGER BULLWORTHY  
PLANNING CONSULTANT

The development proposed is to add an additional floor to the existing building constructed pursuant to planning permission reference 21/00701/FUL dated 14th February 2022.

That planning permission; having been lawfully implemented, not only by the completion of the building's walls but also by the provision of below ground service connections, constitutes the "fallback position" with respect to the planning consideration of this application.

The Court of Appeal in their Judgement *Mansell v Tonbridge and Malling BC* (2017) EWCA Civ 1314 given by Lindblom L. J. confirmed that the "fallback position" is a valid planning consideration.

The lawful approach to the planning consideration of this proposal is that such consideration is limited to the impact of the alteration proposed and not the development as a whole.

Local planning policy has not changed since the grant of the existing permission.

Central Government's Policies, contained within the NPPF have been updated twice, the latest update in December 2023. The emphasis of the NPPF in section 11 is to make the effective use of land specifically identifying in paragraph 124 e) the opportunities to use the airspace above existing residential premises for new homes.

The NPPF stresses that, in particular, decisions "should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed, and can maintain safe access and egress for occupiers".

The previous section Planning History includes reference to the main points of the pre application advice from officers in respect of the implemented development and in particular that either a three or four storey development may be appropriate.

The Architect in designing this proposal has taken full account of local planning, development and design policies and includes within the History section a list of those items considered.

The officer's report to the Planning Committee on the 13th January 2022 in respect of the existing building includes a detailed assessment of how that building met the requirements of policies of the LDF Development Management Policies Document (2015).

The report's assessments dealt with, Quality of Accommodation, Housing Mix, Impact upon Character and Appearance of the Area and Impact upon Neighbouring Residential Amenities.

These assessments are equally applicable to the alteration proposed within the current application, identifying its compliance with appropriate policies of the Local Plan.

The proposal accords with the policies of the Development Plan and the objectives of the NPPF in making effective use of land.

The proposal is a well-designed scheme of sustainable development and the presumption in favour of sustainable development set out in Para 11 of the NPPF is fully applicable to this proposal.

## 2.0 Site & Context

### Site Location

The application site comprises a partly constructed detached apartment building.

Friars Garth  
The Parade  
Epsom  
Surrey  
KT18 5DH

The site lies within the urban area where new residential development, is acceptable in principle and is strongly supported by both national and local planning policy. The site is in a highly sustainable town centre location, which has a good range of services, facilities, employment, public transport and leisure opportunities.

The NPPF actively promotes the delivery of new homes through the redevelopment of sustainable brownfield sites such as this. It also places an emphasis on making the more effective use of land and developing at higher densities where appropriate.

The site is located within the urban area of Epsom Town centre.

The site is not positioned within the Metropolitan Green Belt or any landscape designation. The property is not listed or located in a conservation area.

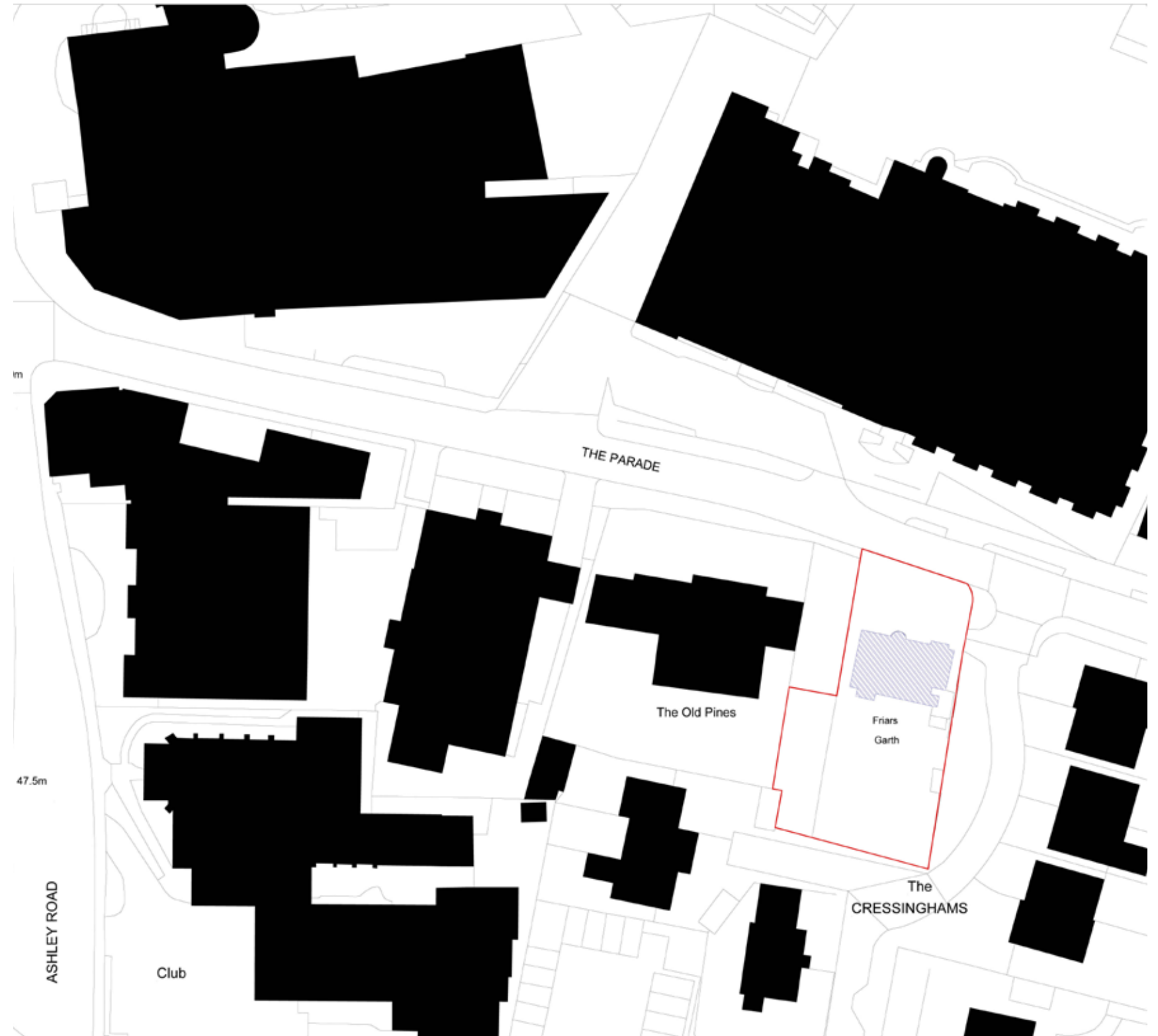
The site lies within Flood Zone 1 and is therefore at a low risk of flooding.

The site is positioned within a great location in Epsom and creates a great opportunity for well-considered apartments.

Accessed from a private entrance from the Parade, the building is served by a shared communal area.



Google Maps



Existing OS Map (Block plan)



**Site Analysis**

The surrounding area comprises three and four storey detached properties varying in design and typology.

The site location exhibits typical features synonymous with its town centre position, from boundary treatments, building form and materiality.

The site fronts the Parade with the Council Offices on the opposite side of the road. The eastern and southern edges of the site border the adjacent privately gated Cressinghams development, a small close of some 13 mostly semi-detached two and a half storey dwellings. There are some flats at the end of Hereford Close. There is a large grass verge on the eastern side which is within the control of the applicant.

The site does not lie within any local or national planning policy designations. The site does however sit within close proximity to a grade 2 listed property known as The Pines. The Pines, 2, The Parade, Epsom, KT18 5DH. This property was first listed on 22 March 1974. We understand this building is in commercial use as a clinic having previously been in office use.

The site holds no Tree preservation orders.

The immediate surrounding area accommodates National Rail, bus links, great road networks and space for cycling.

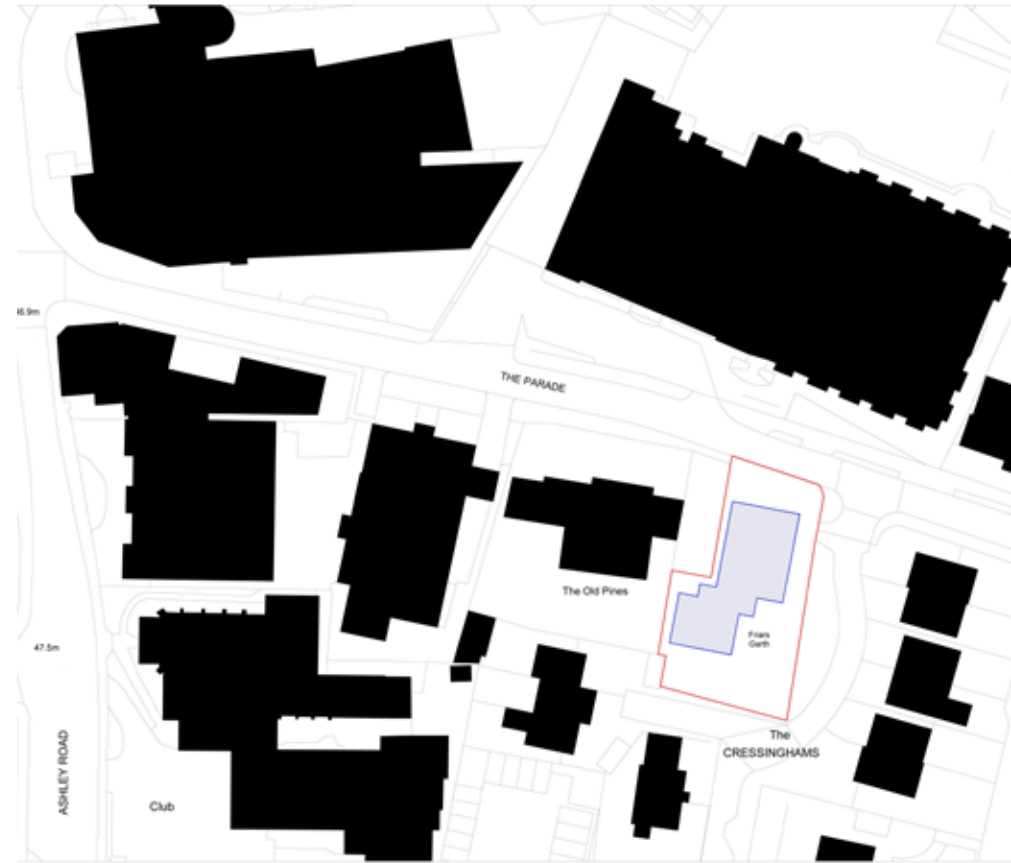
The wider area comprises a mix of uses, typical of the site's town centre location. The Parade comprises a mix of uses including residential, offices, a hotel and some community uses including a Church. The town centre itself is more commercial in nature.

The architectural character of the immediate area is varied with buildings of different scale, styles, height and form.

The proposed scheme would have no impact on the area and neighbouring properties. There are no overriding constraints which would unduly influence the design such as important views, architectural features, retention or protection of physical features.

The site benefits from being in a quiet secluded area surrounded by existing built urban environment.

It is not considered that there would be significant impact on the amenity of neighbouring properties.



**Proposed Block plan**



**Google Maps**



**Google Maps**



**Local Plan**



### 3.0 Planning History

The site holds previous planning applications that have been approved.

We note this application seeks a material change to the approved planning scheme 21/00701/FUL.

The previous applications were produced/designed by another Architect (nye saunders).

PRA have been commissioned to deliver the planning approval and seek approval for an additional floor holding 3 additional apartments, creating much needed high quality accommodation within Epsom.

The architectural design and space planning is retained following the previous planning approved scheme reference - 21/00701/FUL.

Alternative pre-application schemes for the residential redevelopment of the site were submitted by the architects in December 2018 and following a meeting in February 2019 a formal written response was received from the Council on 22 March 2019 (references 18/01378/PRE-APP and 18/01379/PRE-APP).

The first scheme comprised a 9-unit apartment block in one three-storey building with surface parking to both the front and rear of the site. The building was of contemporary design.

The second scheme comprised 5 houses, with a terrace of three facing The Parade and a pair of detached houses towards the rear, with separate access and parking.

The main points raised by Officers at pre application stage can be summarised as follows:

- The principle of redevelopment is acceptable
- The site is located within the town centre which is the most accessible and sustainable location within the Borough.
- Given its town centre location a flatted development is considered appropriate.
- There should be a strong design base with symmetrical upper floors.
- The Council notes surrounding buildings vary in height and denoted that both a three storey development and a four storey development may be appropriate.
- Any building should respect the adjacent listed building and should be set back from The Parade, respecting the existing building line. The width of any proposal should match that of the adjacent listed building.

#### Planning History

Approved full planning 21/00701/FUL, was updated based on the pre application advise.

The key changes the architects made were as follows:

- The portico was amended to reduce the decorative balustrading and its apparent scale.
- The glazed link between the front and rear blocks was made more solid and traditional in appearance and a rear, side entrance canopy was added.
- The rear balconies were moved off centre and the proportions of the rear façade improved.

We note the pre application advised an opportunity for a four storey scheme which was not progressed. Based on this the proposed application seeks simply for an additional floor while retaining the architectural design and materiality.

While these have been taken into full consideration as part of this proposed material change, the design changes have ensured to capture local policy and the following items:

- Height and scale
- Roof line
- Townscape and visual impact
- Parking and highway safety
- Massing and bulk
- Right to light and outlook
- Design quality
- Longevity with design and detailing
- Consideration to weathering
- Quality of design including materials

We feel the scheme has been designed to more than acceptable standards. which respect the existing local character and surrounding area while adding high quality homes to the local area.

Elevations from the Approved planning scheme 21/00701/FUL  
nye Saunders Ltd



EAST ELEVATION



WEST ELEVATION



NORTH ELEVATION



SOUTH ELEVATION



Ground Floor



First Floor



Second Floor



## 4.0 Character Appraisal

The site has a single point of access from the Parade through a boundary which features trees and other planting.

The site lies in an urban area with mixed use classes, building holding both residential and commercial uses. The area comprises of three and four storey buildings all typically being detached.

The architecture varies however the larger building are of a Georgian appearance. The main concept behind the approved planning scheme comprises a high-quality design creating an authentic Georgian appearance in scale, form and detailing when viewed in conjunction with The Pines to the west and the immediate surrounding area.

The application site is within an urban area where there is a presumption in favor of sustainable development and where the principle of residential development is acceptable.

Local policies relate to the Design of New Development and requires new development to be of a high quality design that makes a positive contribution to the area.

Policy states that new development will be expected to use high quality materials, landscaping and building detailing and have due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site.

The area is characterised by detached three and four storey buildings set back from the road. The design and materials vary along the street scene and immediate area.

Local policy states that development should be designed to respect the scale, form and external materials of existing buildings in the locality to reinforce local distinctiveness and be of a height, bulk, mass, and siting to ensure the development is in keeping with the existing street scene.

Development should incorporate plot widths, front garden depths, building orientation and spacing between buildings in keeping with the layout in the locality and provide well-designed access roads, with space for suitable landscaping and maintain separation to neighbouring properties.

The proposal retains the approved scheme and recent material variations while simply increasing the height to create a new fourth floor holding 3 new apartments. This following the street scene, the urban locality and national planning policy with building heights and additional floors being appropriate to urban areas.

We believe the external appearance of the proposed dwelling is acceptable and would lead to a form of development, which would be compatible with the varied character of the area.

As per the NPPF, innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles should not be stifled.





## 5.0 Heritage Review

The site does not lie within any local or national planning policy designations. The site does however sit within close proximity to a grade 2 listed property known as The Pines.

The Pines,  
2 The Parade,  
Epsom,  
KT18 5DH

This property was first listed on 22 March 1974. We understand this building is in commercial use as a clinic having previously been in office use.  
Listing NGR: TQ2093960698

The heritage asset is mid 18th century building. However has been majorly altered. The building holds render, sash windows with Georgian proportions and hipped roof.

The architectural style has been lost through the addition in the nineteenth and twentieth centuries of large extensions to both sides and to the rear and the application of render which removed all the original stone or classical detailing.

The extension and modification over the years has also created varied window sizes and fenestration changes. The property is three storeys in height, with flat roof extension to the rear.

It is understood that the interior retains the original staircase on top floor, with closed string and turned balusters. Along with some original interior detailing such as paneled walls and pilasters.

The proposed scheme we feel follows both national and local planning policy with regards to designing new buildings within the immediate vicinity of heritage assets in this case a grade 2 listed building.

Local planning Policy -

The Epsom and Ewell Local Planning policies are set out in the Core Strategy 2007, and the Development Management Policies 2015. The Core Strategy includes strategic policies for the whole borough. Those that relate to heritage, including the built heritage are set out in the section titled Conserving and Enhancing the Quality of the Built Environment.

Local Policy CS 5 states that, The Council will protect and seek to enhance the Borough's heritage assets including historic buildings, conservation areas, archaeological remains, ancient monuments, parks and gardens of historic interest, and other areas of special character.

Development should:

- Create attractive, functional and safe public and private environments
- Reinforce local distinctiveness and complement the attractive characteristics of the Borough
- Make efficient use of land and have regard to the need to develop land in a comprehensive way.

Planning permission will be granted for proposals which make a positive contribution to the Borough's visual character and appearance.

- 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.

The application site is located to the south of Epsom High Street in the town centre. The site is on the south side of The Parade which leads from Ashley Road to Worple Road. The most prominent buildings down The Parade are the hotel at the start of the road and the offices of Epsom and Ewell Borough Council, which the site sits directly opposite.

Other properties are of scale, size and density and vary from three to four storey with a varied street scene. The grain of development changes from dense and an urban environment through to more sub-urban to the east with the site located closer to the urban end of the transition and closer to the larger more dominant buildings.

From within the application site (Friars Garth) none of the original house of The Pines, can currently be perceived, as it is almost entirely subsumed by later extensions to the side and rear. The main flank elevation is blank and part 19th and part 20th century in date.

Whilst the experience of the listed building from within the site is limited or negligible it is possible to conclude that the application site does form part of the setting to the listed building due to the history of the land. However they are now fully separated with separating urbanized boundaries and are of an appropriate distance from one another.

It should be noted that the application site and the listed building do not sit within a designated Conservation Area. The setting is therefore not considered of historic importance to the degree that would require Conservation Area protection.

Based on the location and design we believe no significant harm will come with the proposal with due respect to heritage asset.

To the contrary the framing and setting of the listed building as shown by the proposed street scene is significantly enhanced by having a four storey building on each side.





# 6.0 The Proposal

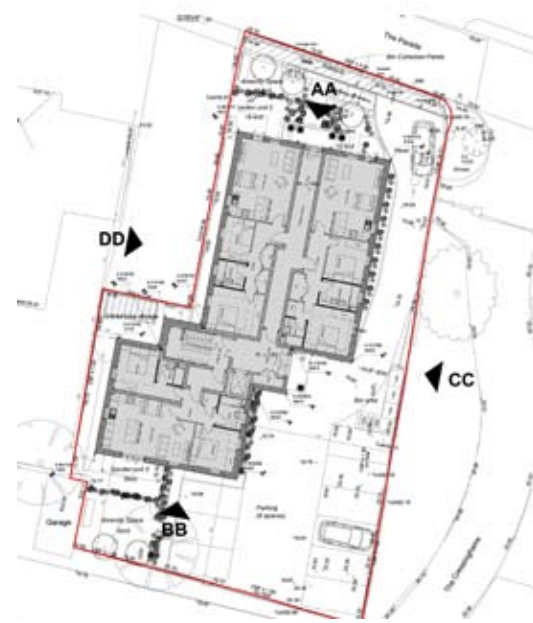
## The Proposed Design

The proposal is to retain the as approved scheme however to simply provide an additional floor to create 3 new apartments.

This proposal is set out based on the opportunity to add another floor following the site location facilitating this with no architectural or planning constraints.

We note the original pre application advised that the proposal could hold four storeys due to the nature of the varied street scene and building typologies.

The third floor windows are reduced in height to help with the proportions of the building. This retains the Georgian design and proportions ensuring the property sit and relates appropriately to the surrounding areas.



Elevation AA



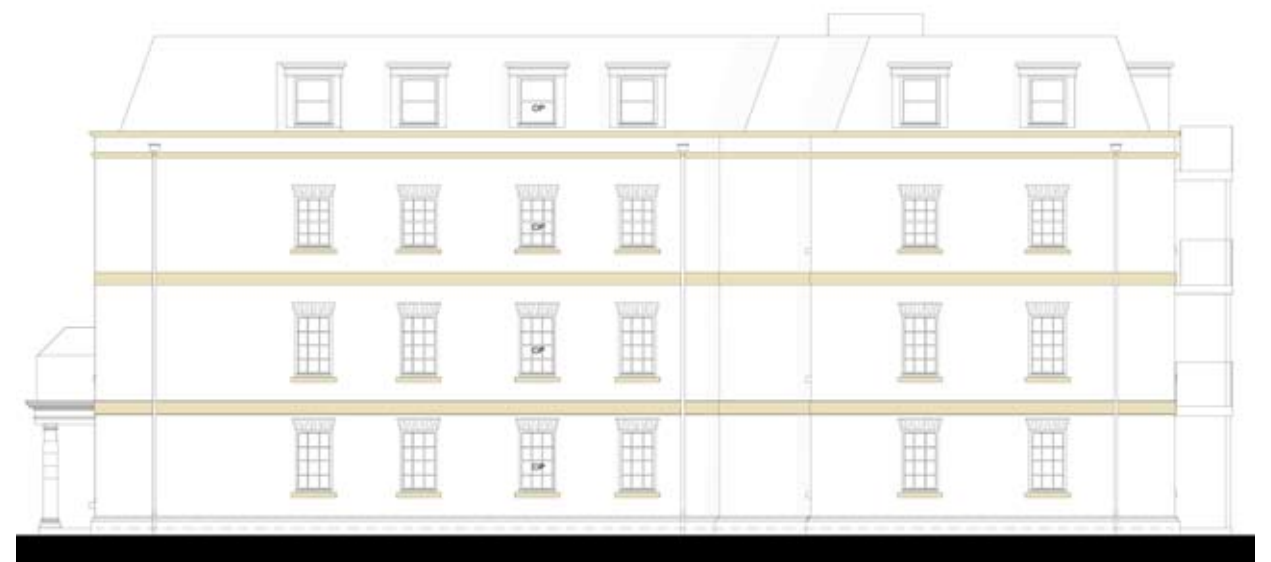
Elevation BB



Elevation CC



Elevation AA - NTS

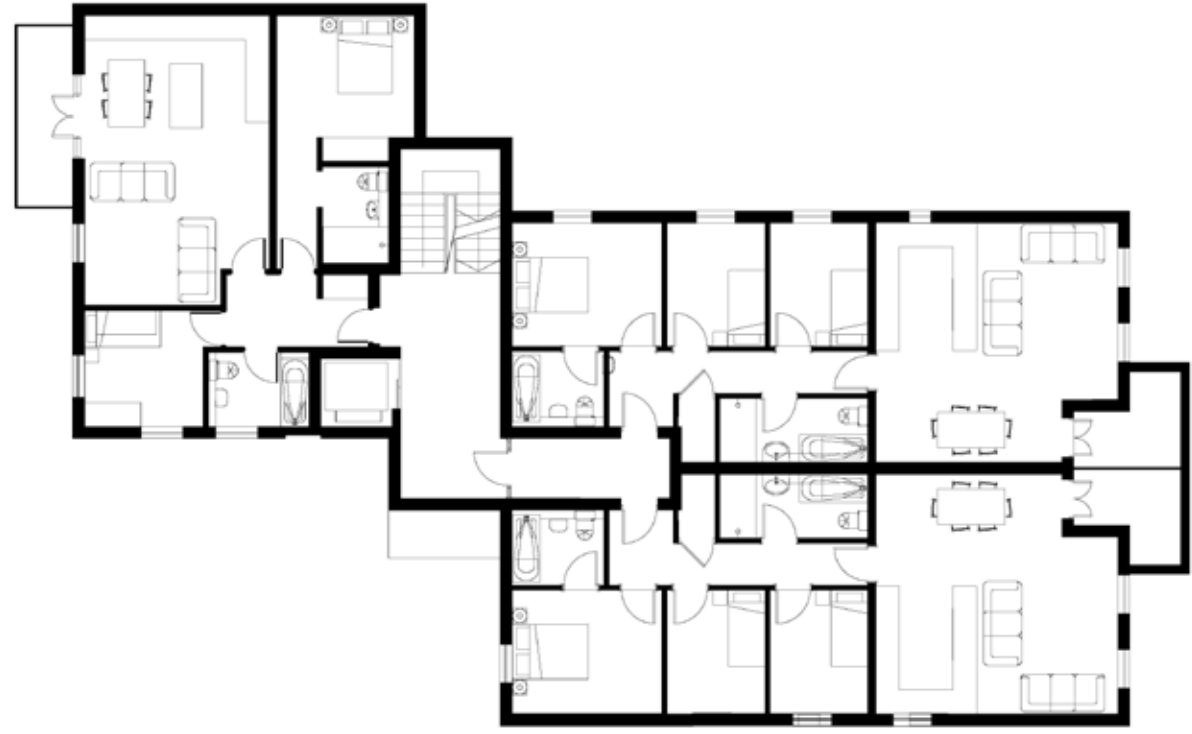


Elevation DD





**Ground Floor**



**First Floor**



**Second Floor**



**Third Floor (Proposed new floor - 3 x 2 bedrooms flats)**

# 7.0 Scale and Density

The proposed scheme is to add an additional floor onto the as approved planning scheme, creating three new apartments. This will follow the overall massing, scale and density of the urban settlement and street scene.

Creating an additional floor will create rhythm into the street scene with varied heights of buildings. The design ensures to follow all design requirements and retains the architectural approach.

The proposal follows the Epsom and Ewell Local Plan 2022-204, in particular town centre allocation including Policy S2 and S3 Making efficient use of land. The site sitting within the Parade has been adopted for three and four storey developments with new development opportunities as shown within the local plan.



Google Maps



Bing Maps

- 3 Storey Buildings
- 4 Storey Buildings



4 Storey Building

Heritage Asset - The Pines





We believe with the introduction of an additional floor the proposal creates two bookends within town planning thus adding additional emphasis to the heritage building and improving the existing street scene.

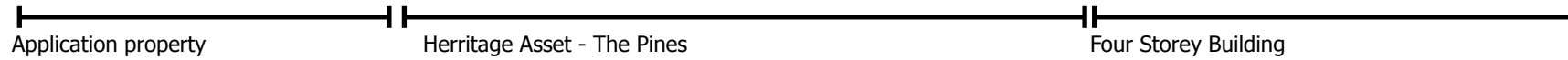
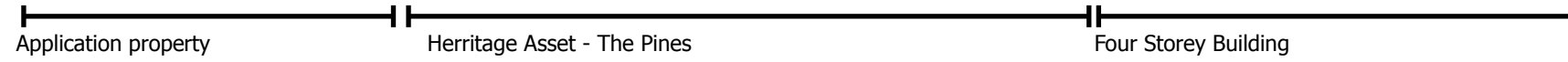
The additional floor improves the neighbouring properties with scale and proportion.



**Planning Approved Street scene**



**Proposed Street scene**



**Comparison Elevation**

- Planning Approval
- Proposed

## 8.0 Planning Policy

The scheme is believed to be designed in line with national, regional and local planning policies. We feel the scheme enhances the site and responds architecturally with regards to the surrounding neighbourhood.

The adopted Development Plan comprises the Epsom Ewell Borough Council Core Strategy (2007) and the Development Management Policies Document (2015).

The proposal also follows the **Epsom and Ewell Local Plan 2022-2024**, in particular town centre allocation including Policy **S2 and S3** Making efficient use of land.

The site sitting within the Parade has been adopted for three and four storey developments with new development opportunities as shown within the local plan.

**DMP Policy DM10** states that development proposals will be required to incorporate good design and contribute to the character, density, scale and local distinctiveness of a street or an area. It goes on to say that development proposals should have regard to the amenities of future occupants and neighbours, including in terms of privacy, outlook, sunlight/daylight, and noise and disturbance.

Based on this we feel the scheme follows the policy with regards to the street, design and scale.

**Policy DM11 (Housing Density)** provides in principle support for proposals for new housing that make efficient use of development sites located within the Borough's existing urban area. The density of new housing developments will in most cases not exceed 40 dwellings per hectare, with the following exceptions; it can be demonstrated that the site enjoys good access to services, facilities and amenities via existing public transport, walking and cycling network and the surrounding townscape has sufficient capacity to accommodate developments of higher density.

The proposed scheme is creating an opportunity to make efficient use of a town centre site with great connections and housing opportunity.

**Policy DM13 (Building Heights)** is also relevant.


We note that the proposed building is below 12meters and four-storey buildings in the vicinity which therefore set a precedent in this regard.

**Policy DM8** considers the impact on heritage assets.

It is noted that the approved scheme was considered to not have any significant impact upon the setting of 'The Pines'. This is confirmed in paragraph 9.33 of the planning committee report dated 13th January 2022.

The building lies adjacent to 'The Old Pines', a Grade II listed 18th-century town house. Both the building and its setting have been altered such that, in our view, an additional storey could be accommodated with no significant harm.

The additional storey is designed to successfully continue the established and approved design, to follow the approval and street scene.



**Policy S3:  
Making Efficient  
Use of Land**

3.32 Planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

**Why we need this policy**

3.33 Due to the constrained nature of the borough, the council must maximise the use of previously developed or brownfield land with the urban area to assist in meeting the housing requirement and other development needs over the plan period, for example by supporting the development of under-utilised land and buildings.

3.34 Optimising the density of development will concentrate development in the most sustainable locations, assist in reducing private car use, promote shifts to sustainable modes of transport and support the commercial viability of local services and facilities.

**Policy S3:  
Making Efficient  
Use of Land**

- 1) Development must make efficient use of land by following a designed approach to optimise the capacity of sites within the borough's urban area as defined on the Policies Map.
- 2) Site allocations will be expected to deliver the minimum number of homes specified within Policies SA1- SA9 of the Local Plan. Proposals for all other major residential developments are expected to achieve the following minimum net densities, based on the areas below that are defined on the Policies Map:
  - a) Epsom Town Centre a minimum density of 80 dwellings per hectare (dph);
  - b) Principal movement corridors and transport hubs beyond Epsom Town Centre boundary – a minimum density of 60dph; and
  - c) Remaining urban area – minimum density of 40dph.
- 3) Proposals for major development<sup>2</sup> that do not meet these density standards will only be permitted where it has been demonstrated that development at the identified density would be inappropriate.
- 4) Proposals for residential development of fewer than ten homes are expected to demonstrate how they have achieved efficient use of land.

**Strategic Policy**



## 9.0 Conclusion

### Summary and Conclusion

We have considered carefully the scale and character of the surrounding area and designed the scheme so there is no impact on neighbouring properties and amenity.

The overall scale, height, massing etc. follows the street scene.

The proposed scheme has taken into consideration all relevant advice from the approved planning design and all planning applications within the immediate and surrounding area.

The proposal would make a positive contribution to the area and be in keeping with the area in terms of its scale, massing, siting, form and design.

The application provides an addition of three new homes constructed to a modern standard in an accessible town centre location in line with current planning policy.

On the above basis we believe the proposal should receive support from the Authority and be granted planning permission.