



Finachem House - 2-4 Ashley Road

Epsom and Ewell Local Plan Examination
Stage 2 Hearing Statement
Matter 11: Site Allocations

Andrew Black Consulting on behalf of Gavil Group

September 2025

Project	Finachem House
ABC Reference	ABC/0249/08.02.11
Local Authority	Epsom and Ewell Borough Council
Client	Gavil Group

Issue	Final
Author	Andrew Black
Date	September 2025

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1. Introduction

1.1 This matters statement has been prepared by Andrew Black Consulting on behalf of Gavil Group in relation to their interest in the land at Finachem House, 2-4 Ashley Road, Epsom. The land is allocated in the local plan under policy SA11.

1.2 These representations are made in the context of the tests of soundness as set out in paragraph 36 of the current National Planning Policy Framework (NPPF). This states that plans are ‘sound’ if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.3 Finachem House is located within Epsom Town Centre and is allocated for development of approximately 20 dwellings under policy SA11 of the local plan.



Figure 1 – Site Area

1.4 The allocation of the site, follows previous pre-application with the council on the potential redevelopment of the site. Whilst the allocation of the site is welcomed, the allocation for 20 dwellings is not reflective of the true development potential of the site or reflective of the

aspirations presented to the council during the pre-application discussions. It is recognised that any capacity in the plan is indicative and does not represent a maximum capacity. Nevertheless, the low indicative capacity of this site would not represent a viable, realistic or developable amount of housing. More importantly the approach taken to the development potential of this site is indicative of wider issues with the plan, particular in reference to the approach taken to urban capacity.

- 1.5 These representations set out comments in relation to key matters of soundness for stage 2 of the hearings in relation to Matter 11: Site Allocations.

2. Matter 11: Site Allocations

- 2.1 The inspector has set out a number of questions directly to the council and tasks for the council to complete in relation to individual site allocations. These questions are noted and the responses will be reviewed in advance of this hearing sessions.
- 2.2 No submissions are made in respect of the other site allocations in the plan and these are matters for the council and individual promoters of those sites to respond on.
- 2.3 In relation to Finachem House, the Inspector has set out the following question:

13.15) How has the capacity of the site at 20 dwellings been arrived at and what evidence is there to support the position that 20 dwellings would make efficient use of land in line with policy S11?

- 2.4 The introduction of chapter 4 (planning for places) sets out that the site allocations are informed by a range of evidence base documents which includes:
- The Land Availability Assessment (LAA);
 - The Site Assessment; and
 - The Sustainability Appraisal.

- 2.5 In relation to the Sustainability Appraisal (SD05a), this sets out the urban allocations in chapter 8. Paragraph 8.1.11 sets out the following as a summary of what was actually assessed with the SA.

The plan presents a total of 30 allocations within the existing urban area; however, not all warrant being a focus of the appraisal, for a range of reasons, and recognising that there is merit in focusing attention on the matter of Green Belt allocations, given a need to focus the appraisal on 'significant effects'.

- 2.6 The SA then goes on to set out the following in paragraph 8.1.12:

*Firstly, there is no need to focus attention on those allocations that deal with sites that feature within the recently published **Epsom Town Centre Masterplan**. This is because in all cases the allocation seeks to align fully with the Masterplan, and the process of preparing the Masterplan allowed for ample opportunity to explore issues/opportunities and options with the various sites.*

- 2.7 The sites listed include Finachem House at the final bullet point where is states:

Global House and Finachem House (2 – 4 Ashley Road) – are then the final sites that are a focus of the Masterplan, and together are set to deliver around 95 homes, which is broadly in line with the proposal at the Draft Plan stage (2023). It is noted that Finachem House is at the pre-application stage, and so it will be important to ensure a suitably coordinated scheme with adjacent Global House.

- 2.8 It is therefore clear that there is no detailed assessment of capacity or alternatives for a higher density scheme with the SA.
- 2.9 The LAA 2022 (HB02a) sets out a list of deliverable sites at appendix 1 and states a potential number of 42 dwellings for Finachem House with no other commentary.
- 2.10 In June 2023, Gavil Group held a pre-application meeting with the council in relation to their plans for the site. The proposed pre-application scheme, as submitted to the council, was for a 7 storey block containing 131 student rooms across 20 cluster flats. The information submitted in support of the pre-application is set out within appendix 1 of this hearing statement. A letter of support from the University of Creative Arts was also included.
- 2.11 A pre-application response was received in September 2023 and is included in appendix 2 of these representations. The principle of redevelopment of the site was supported but concerns were raised over the height of the proposals with specific reference to adjoining heritage assets. It is therefore clear that the council has been aware of the development aspirations for this site for some time.
- 2.12 The LAA 2024 (HB01a) sets out in appendix 7 the *notable changes in this document compared to the previous LAA (2022)*. In relation to Finachem House it states that the yield is reduced from 42 to 21 units and in the comments it states:
- Reduced yield as 8 storeys unlikely to be appropriate in this location.*
- 2.13 The Epsom Town Centre Masterplan (HB06a) was published in August 2024.
- 2.14 The masterplan sets out the development framework for Market Square and Ashley Avenue where Finachem House is identified as an ‘opportunity site’ adjoining a Civic Space as indicated below:

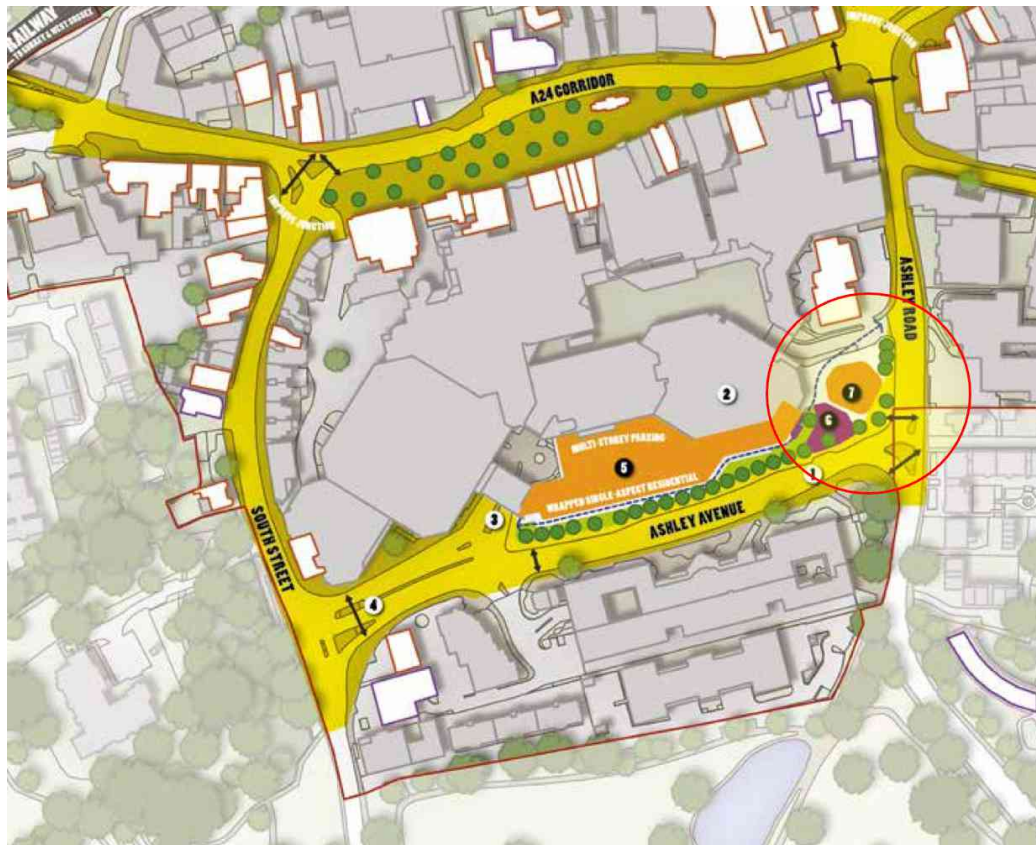


Figure 2 – Town Centre Masterplan Extract

- 2.15 Section 5 of the masterplan sets out options for the identified opportunity sites. Page 56 sets out site information in relation to the site. In the box labelled 'site and development considerations' there is specific reference to Finachem House where it states that *there is further potential to incorporate residential property at the corner of Ashley Avenue and Ashley Road to deliver a larger scheme.*
- 2.16 The Masterplan then sets out the following in relation to Site and Development Considerations:

Proximity to the conservation area and several listed buildings indicate the need to test the impact of building heights. The options are informed by the informal heritage and townscape view analysis undertaken as part of the Masterplan exercise.

Key planning and design considerations include:

- *The existing mature trees along Ashley Avenue should be retained.*
- *Any new scheme should ensure the operation and commercial viability of the retail centre, car parking and theatre are not hindered or disrupted.*

- *Building heights should respond to the surrounding context and a townscape and heritage impact assessment should be prepared to inform the height of the scheme at the planning application stage.*
- *New development should be designed to animate Ashley Avenue. Building frontages should include balconies and front doors to bring life and enhance residential amenity.*
- *Residential car parking should be limited due to the sustainable location.*

2.17 Under the site options the land at the far east of the site is Finachem House as indicated from the extract below:

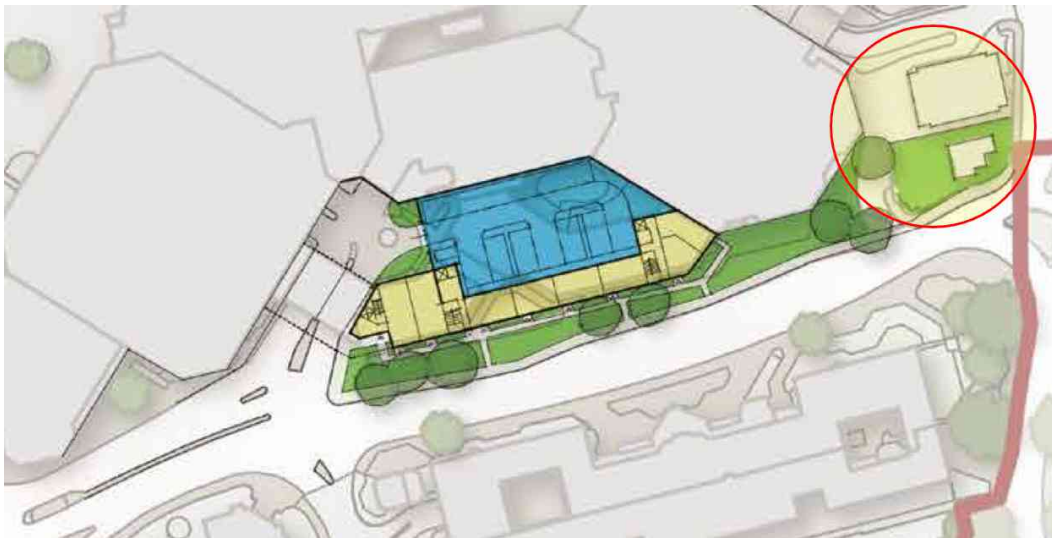


Figure 3 – extract from option 1 of Town Centre Masterplan

2.18 Option 2 then explores a more comprehensive approach which includes redevelopment of Finachem House as illustrated below.

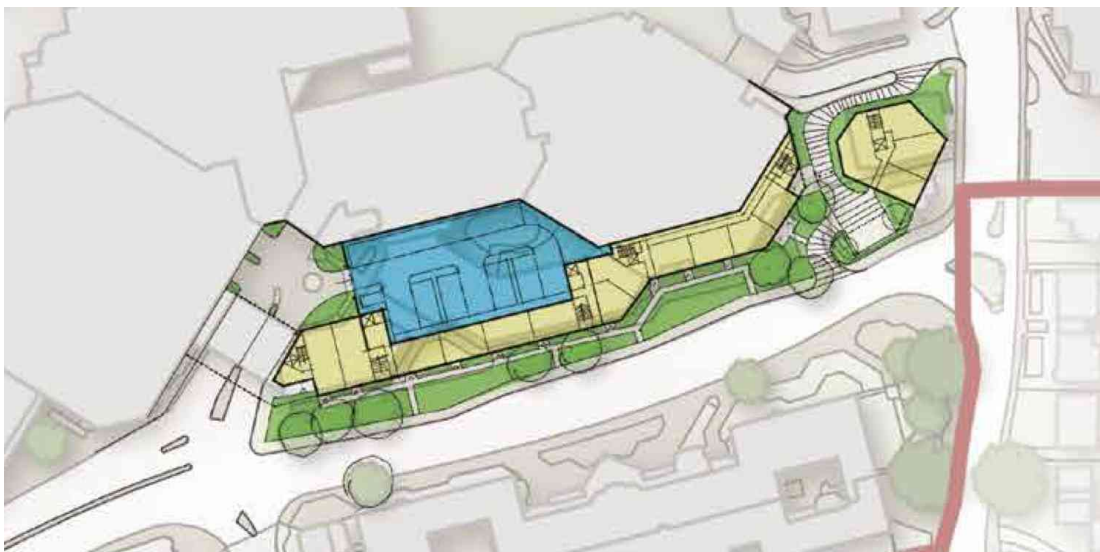


Figure 4 – Option 2 of Town Centre Masterplan

2.19 The details set out indicate that the main element of the site will be 8 stories but development at the edges at 4 storeys.

2.20 In relation to student housing, the Housing Topic Paper (TP03) sets out the following in relation to student accommodation at paragraph 6.11:

The borough's higher education providers which have expansion plans are expected to generate additional need for purpose-built student accommodation to increase over the Local Plan period. The University for the Creative Arts currently have approximately 1,700 students at the Epsom Campus although there is currently capacity to increase the number of students to approximately 2,000 students, the level of growth is less than what was envisaged at the time the HEDNA was produced.

2.21 This is also reflected in the supporting text of policy S7.

2.22 It is accepted that the level of growth of students for the UCA may be at a lower level than originally envisaged in the HEDNA, however it is clear that growth will still occur and without further student accommodation being provided then these students will likely seek accommodation in standard family housing, HMOs or out of borough. It is notable that none of the allocations within the plan seek a provision of student accommodation. Despite the clear intention of the client to redevelop the Finachem House site for student accommodation, this has not been reflected in the wording of the policy.

2.23 The redevelopment of the site at 4 storeys for student accommodation would yield around 60-70 student bedrooms which is not viable as stand alone PBSA. Furthermore a development of just 20 dwellings as indicated under policy SA11 would simply not be viable once a policy compliant level of affordable housing is included.

2.24 Given that the site is indicated within the town centre masterplan as an opportunity site it is considered highly important that it comes forward for development alongside the other opportunity sites in the area. Whilst the constraints in terms of heritage and townscape are appreciated it is not considered that these give rise to a restriction on this site of only 4 storeys.

2.25 There is little evidence that the 20 units as set out in the allocation is based on sound evidence nor would it make efficient use of land as required by policy S11 of the plan and the wider provisions of the National Planning Policy Framework in this regard.

1953 Words



Finachem House - 2-4 Ashley Road

Appendix 1 – Pre-application Submission – June 2023

Andrew Black Consulting on behalf of Gavil Group

September 2025




2/4 ASHLEY ROAD


PRE-APP PLANNING STATEMENT

MACMO DEVELOPMENTS LTD

OCTOBER 2022



Unit 5
Woodcote Mews
Chequers Lane
Walton on the Hill
Tadworth
KT20 7ST

 01737 812 777

 info@woodgavil.com

DOCUMENT CONTROL

Project	Proposed Student Accommodation Block
Address	2/4 Ashley Road, Epsom, KT18 5AX
Client	Macmo Developments Ltd
Reference	MC1-105

Author	Curt Guven BSc. (Hons) Grad CABE Building Surveyor Project Manager	Signed	
Review by	William Morris Director	Signed	

Issue	Date	Status
1	09/08/2022	Draft
2	14/10/2022	Second Draft
3	17/10/2022	Issue

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1 EXECUTIVE SUMMARY

- 1.1 The report outlines the proposed construction of a 7-story accommodation block at 2/4 Ashley Road, providing 131 student rooms across 20 cluster flats. It discusses relevant planning considerations in support of the proposed development, specific influences affecting the design and justification for the proposed material palette. The report sets out the intention to submit a full planning application in early 2023.


2 INTRODUCTION

- 2.1 This report provides an overview of the proposed development at 2/4 Ashley Road in order to support pre-application discussions with Epsom and Ewell Borough Council (EBBC) planning department. The report seeks to demonstrate an initial review of relevant local planning policy, along with consideration of any potential pre-existing site limitations that influence the suggested design, layout and scale of development.

3 PROJECT SCOPE AND PROPOSAL

- 3.1 The project seeks demolition of the existing buildings at Finachem House, 2 Ashley Road and 4 Ashley Road to make way for full redevelopment of the site. Construction of a purpose-built student accommodation block, for use by the University of the Creative Arts (UCA) in Epsom, is proposed for the site.
- 3.2 The proposed student block is envisaged as a 7-story structure, comprising 130 student bedrooms (of which 6 are classified as accessible rooms) spread across 20 cluster flats as shown in Table 1 below. The building shall incorporate space at ground floor level for the storage of refuse arising from the development; 62no bicycles; associated plant and laundry room provision.

Table 1 – Proposed Layouts

	<p>Ground Floor</p>
-------------------------------------------------------------------------------------	----------------------------



- 3.10 Externally the site will be reconfigured to provide areas of soft and hard landscaping, as well as the provision of 5no parking spaces (of which 1 is classified as an accessible space). The parking spaces are not intended to be used by the student residents, but shall provide space for maintenance operatives to attend the site and serve arrival of the student residents at the beginning of the academic year, and their departure at its end.

4 PLANNING CONSIDERATIONS

- 4.1 The Site consists of Previously Developed Land and is within the Town Centre of Epsom as shown in the planning map in below Image 1.
- 4.2 The site has some planning history relating to continued use of the site for office or D1 uses but none relating to its redevelopment.
- 4.3 The site is close to but not within the Epsom Town Centre Conservation Area. Ashley House, to the north of the site is grade II Listed.

4.4 The site is not within an area at risk of fluvial or surface water flooding.

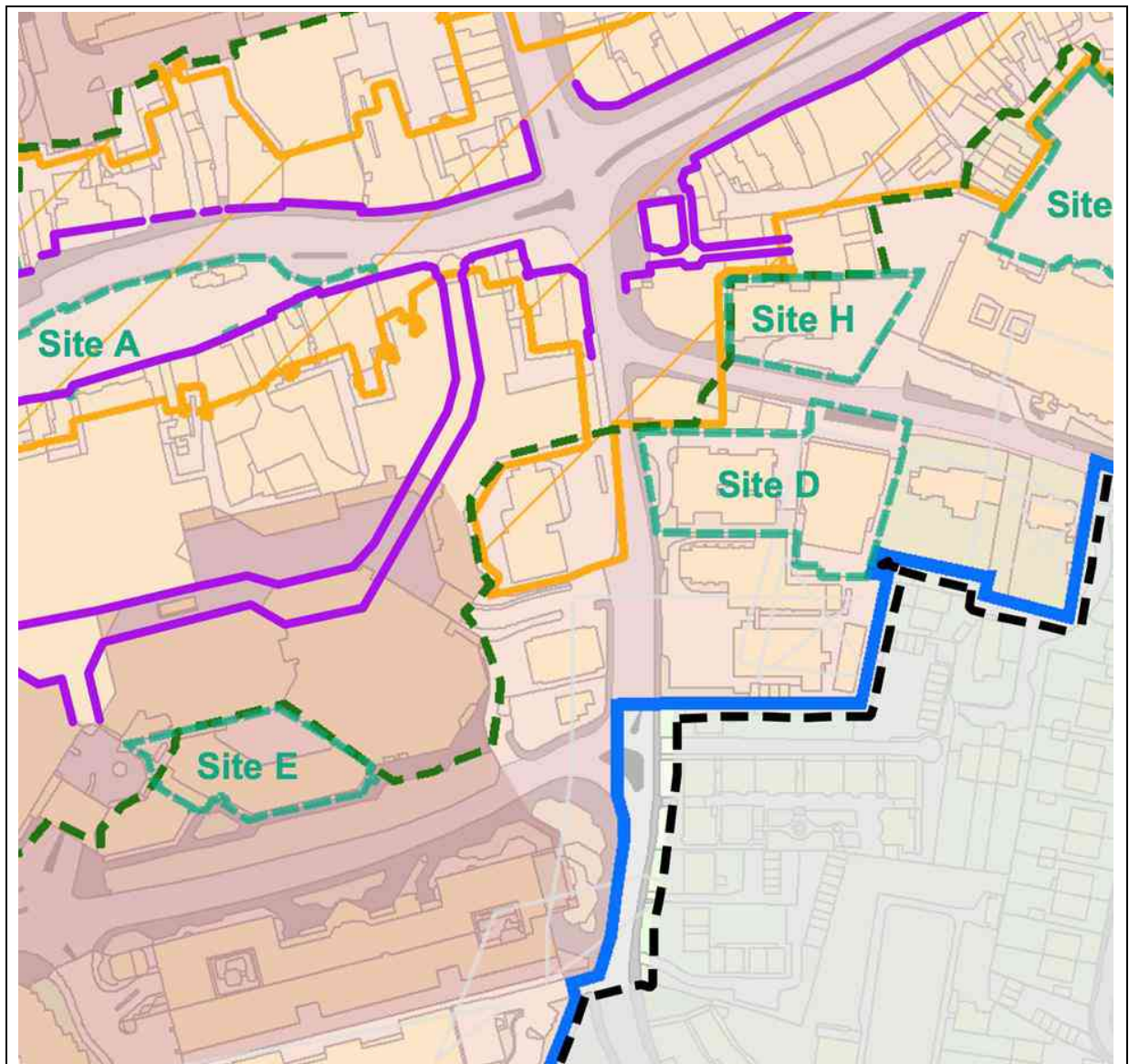


Image 1 – Epsom Planning Map

PURPOSE BUILT STUDENT ACCOMMODATION

4.5 The existing Development Plan is largely silent on Purpose Built Student Accommodation.

4.6 The existing Development Management DPD (2015) sets out the following in relation to Meeting Local Housing Needs:

Another example is that many of our young people are choosing to extend their education, which can present us with an equally challenging housing need. Local education institutes such as Laine Theatre Arts, NESCOL and the University for the Creative Arts have student catchment areas that extend beyond the Borough's boundaries. Because of this we may not always be able to accurately identify the scale

of accommodation required to meet the needs of these institutions. As a consequence, we are reliant upon the institutions to provide us with robust evidence of their student numbers and associated housing need. These projections will take full account of existing accommodation in order to avoid over-provision, which could result in the inefficient use of our limited housing land supply. We will work with our various education institutions to ensure that the needs of their students are met.

- 4.7 In relation to meeting need, the more up to date Planning Practice Guidance sets out the following in relation to how student housing needs can be assessed:

Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area.

Paragraph: 004 Reference ID: 67-004-20190722 Revision date: 22 07 2019

- 4.8 A letter from the UCA which demonstrates their need for additional student accommodation has been provided alongside this report.

5 PROPOSED DESIGN

Building Height and Circulation

- 5.1 The site is situated on a corner plot at the transition point between Ashley Road and Ashley Avenue on the A24 carriageway. The position of the site creates a feeling of openness across its Western and Southern aspects as demonstrated in Image 2 below. Separation distances between the proposed building and existing properties on the opposite side of the carriageway are in excess of 24m. The relative openness around the site generates an opportunity to maximise the vertical expansion of the plot.
- 5.2 The proposed building is 7 stories tall with a finished roof height of 20.55m above ground level. The building is formed around a central core with lift and stairwell providing circulation between each of the 20 cluster flats. This makes efficient use of space and ensures habitable rooms are provided with the maximum amount of external wall space. This enables ample window openings to be provided to these habitable rooms, ensuring a pleasant internal environment for future residents.
- 5.3 Ashley House, a Grade II listed property to the North of the site, is located 17m from the proposed building. Care has been taken to consider the impact of the proposal with respect to Ashley House, recessing the top floor by 3.5m and providing a flat roof design as a response. Such design choices seek to reduce the impact of building overshadowing that would affect the existing amenities afforded to Ashley House.

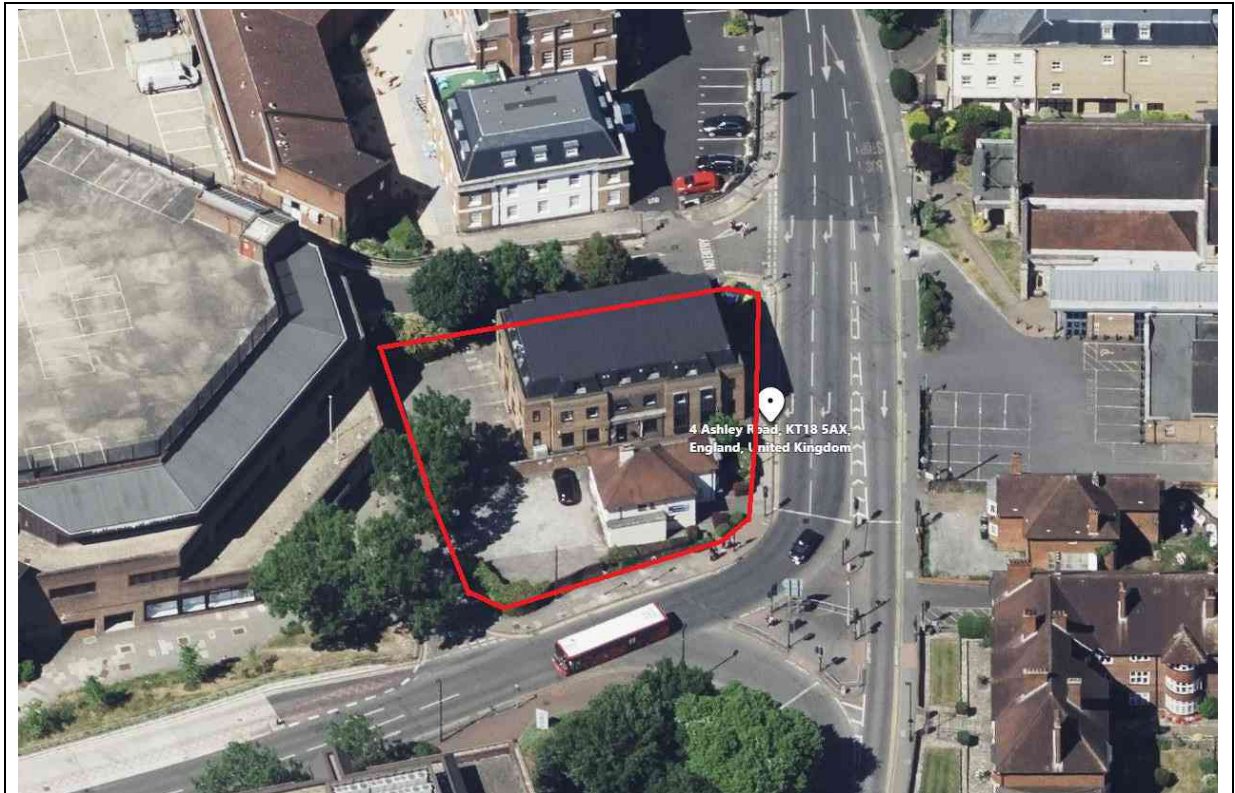




Image 2 – Birdseye Image of the Site


Elevational Design

- 5.4 The building exterior draws inspiration from its surroundings, reference is made to Section 6 which provides detailed discussion regarding the proposed material palette.
- 5.5 As each student bedroom requires an individual window, the elevations are provided with a large number of window openings across a regular and repeating pattern. To break up the elevations and create interest within the façade, the openings have been split into distinct vertical panels. These panels are framed with aluminium box sections and separated by aluminium clad spandrel panels. The design creates three horizontal bands across the façade as shown in Image 3 below. This gives the effect of combining window openings and reducing the perceived height of the proposed building.
- 5.6 The front elevation facing Ashley Road has been recessed to create a focal point of the building, differentiating it as the primary elevation and entrance to the student accommodation as Image 4 below. The recessed design also shelters the bedrooms facing onto the carriageway, helping to ensure light pollution emanating from road users do not untowardly impact the residents in these rooms.
- 5.7 The proposed flat roof provides opportunity for the specification of a green roof, providing significant ecological enhancement on the site (when compared to the existing provision) and an opportunity to manage surface water run-off and associated off-site flood risk, as part of an envisaged SUDS system.

Image 3 – Façade Horizontal Banding	
Image 4 – Recessed Front Elevation	

6 MATERIAL PALETTE

- 6.1 The proposed material palette draws inspiration from the existing buildings it seeks to replace as well as the sites immediate surroundings. This is to ensure the design blends into the street scene and harmonises with the styles displayed within the area.
- 6.2 This is taken in context with the surrounding properties listed in the below Table 2.

Table 2 – Surrounding Properties	
Photo	Site and Description
	<p>Finachem House, 2 Ashley Road</p> <p>The existing building contains red brickwork, lead panelled window ‘pillars’ with black UPVC windows and slate tiled crown roof with inverted dormers and membrane flat roof.</p>



4 Ashley Road

The existing building contains white painted pebble dashed walls, white painted timber windows with red tile sills, bay window with tile hung infill and clay tiled pitched roof with bonnet hips.




Ashley House


A Listed Building to the North of the site, containing a frontage of stocks bricks and otherwise red brick and white rendered panels, white painted pediments and bands breaking up the façade with period correct detailing and white sash windows. To the larger building is a slate tiled pitched roof with lead valley gutters and brickwork parapets to the perimeter edges. To the smaller section of the building is a slate tiled crown roof with a membrane flat roof.



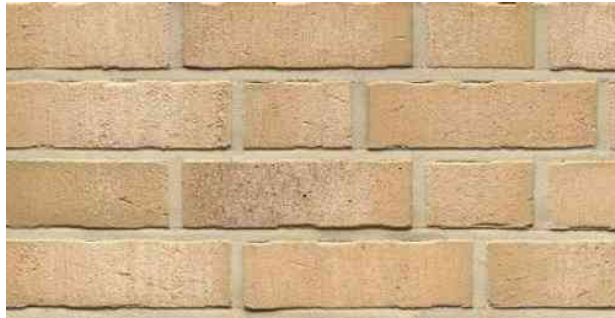
Windsor Court




To the East of the site, containing buff brickwork and ivory rendered panels, sash windows with flat gauged headers in buff with stone sills and a slate tiled roof with leadwork dormers and detailing.

	<p>Epsom Methodist Church</p> <p>To the East of the site, stone built with clay tile roof with modern extension forming entrance comprised grey metallic cladding, curtain walling and standing seam roof. Ancillary buildings are in red brick with white UPVC windows and concrete tiled roofs.</p>
	<p>Ashley Court</p> <p>To the South East of the site, comprising red brick with a mock Tudor frontage comprised herringbone pattern brickwork infill between exposed timber framing, mixture of white rendered and tile hung bays, white UPVC windows with black painted sills and pitched clay tile roof.</p>
	<p>Epsom Gateway</p> <p>To the South of the site, comprising a mixture red and buff brickwork with lead and composite panelling, red/brown aluminium windows with brick soliders heads and sills, silver glazed curtain walling element to the entrance with membrane flat roof.</p>

	<p>Ashley Centre</p> <p>To the immediate West of the site, comprising a mixture red and buff brickwork, brown aluminium windows with brick soliders heads and brick angled sills, black coloured curtain walled shopfront façade with a lead panelled inset top floor with membrane flat roof surrounding the concealed open air car park deck, transitioning to a taller concrete tiled pitched roof further West on Ashley Road.</p>
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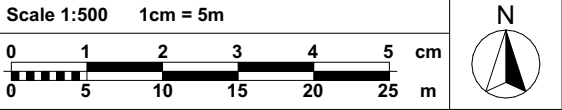
- 6.3 The proposed design seeks to create a contrast between the historical and existing pallet of lighter colours using traditional styled stock brickwork that is blended with modern, contemporary materials such as powder coated metalwork with cement board cladding. The envisaged materials are detailed in Table 3 below.

Table 3 – Material Palette	
Photo	Material and Description
	<p>Buff yellow brickwork</p> <p>Shown: Aquarian Gebrik Slip FE01-28</p>
	<p>Mixed feature brickwork</p> <p>Shown: Aquarian Gebrik Slip SR32-10 (light) and SR32-99 (dark)</p>

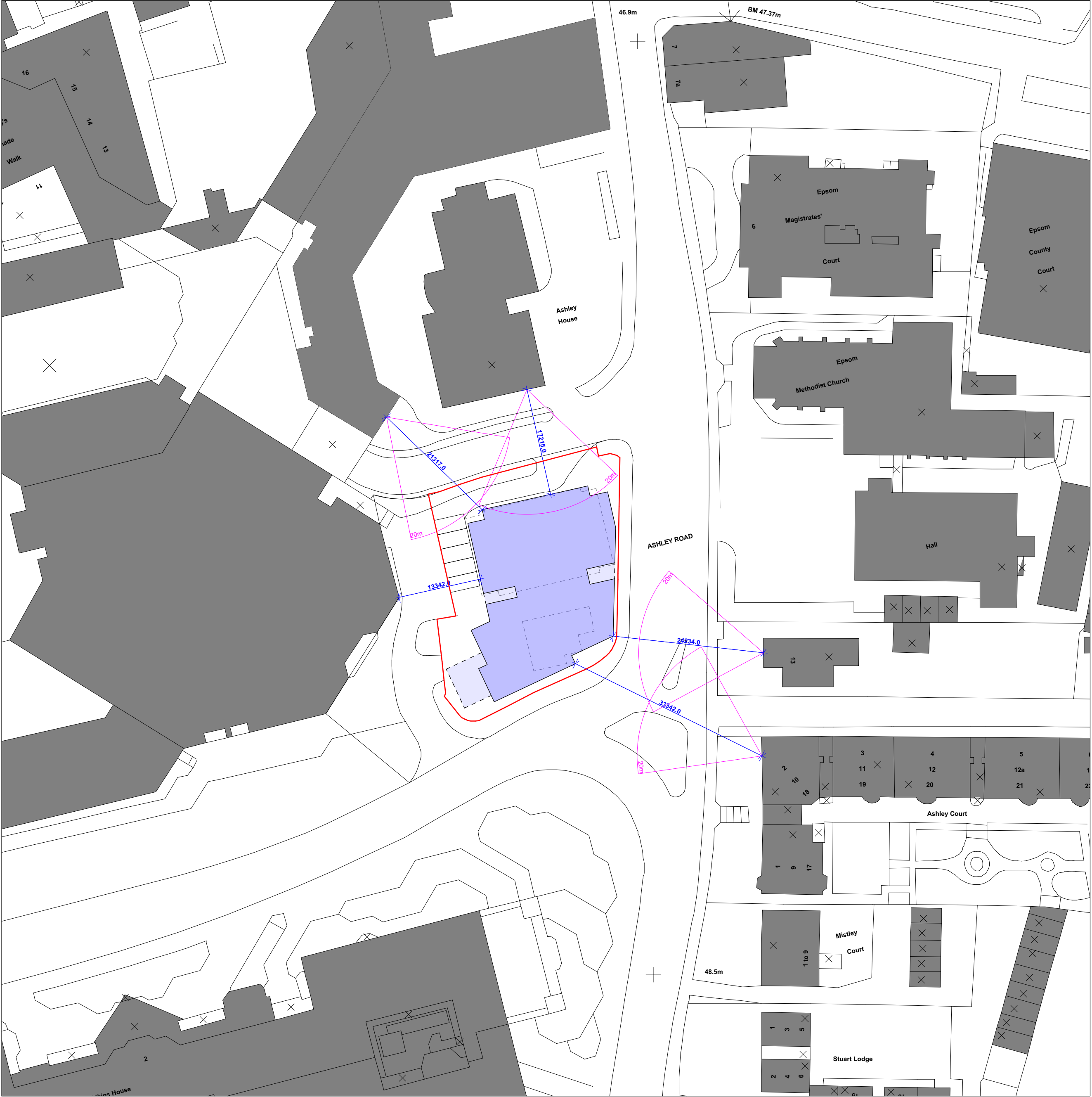
	<p>Cement board cladding panels and suggested panel pattern/design</p> <p>Shown: Rockpanel Stones Concrete Platinum</p>
	<p>Aluminium powder coated windows, infill cladding panels and parapet copings</p> <p>Shown: Interpon 610 - RAL 7016 - Smooth Matt ML249D</p>
	<p>Aluminium powder coated window reveal framework details</p> <p>Shown: Interpon D1036 - Bronze - Metallic Matt SW205G</p>

7 NEXT STEPS

- 7.1 The project team seek to discuss the proposal at a pre-application meeting with EEBC Planning department. First impressions and advice from the planning officers will be duly recorded and evaluated. Suggested changes can then be considered in the context of the proposals viability and implemented within the design as necessary.
- 7.2 Progression of the design and consultation with relevant professionals will be undertaken by the design team to form a fully comprehensive proposal and package of supporting drawings/documentation.
- 7.3 The project team will then seek submission of a Full Planning Application for consideration by Epsom and Ewell Borough Council in early 2023.



NOTES



SITE BLOCK PLAN - AS PROPOSED

REV	DESCRIPTION	DATE	IN

FINACHEM HOUSE & 4
ASHLEY ROAD, EPSOM,
KT18 5AX

Site Block Plan

CLIENT: MACMO DEVELOPMENTS LTD	
PROJECT NUMBER: MC1/105/1	
DATE: 05/10/2022	DRAWN BY: CG
DRAWING SCALE: 1:500 @ A2	
MC1/105/1-0102	-

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RENDERED PERSPECTIVE VIEW 1 - SOUTH / EAST



RENDERED PERSPECTIVE VIEW 2 - EAST / NORTH



RENDERED PERSPECTIVE VIEW 3 - NORTH / WEST



RENDERED PERSPECTIVE VIEW 4 - SOUTH / WEST



Woodcote Mews
Chequers Lane
Walton on the Hill
Tadworth, KT20 7ST
info@woodgavil.com
+44 01737 812777

NOTES

REV	DESCRIPTION	DATE	IN

FINACHEM HOUSE & 4
ASHLEY ROAD, EPSOM,
KT18 5AX

Rendered Perspectives
Sheet 1

CLIENT: MACMO DEVELOPMENTS LTD

PROJECT NUMBER: MC1/105/1

DATE: 04/10/2022 DRAWN BY: CG

DRAWING SCALE: NTS @ A3

MC1/105/1-0801	-
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RENDERED PERSPECTIVE VIEW 5 - BIRDSEYE FROM NORTH




RENDERED PERSPECTIVE VIEW 6 - BIRDSEYE FROM SOUTH



RENDERED PERSPECTIVE VIEW 7 - VIEW SOUTH ON ASHLEY ROAD



RENDERED PERSPECTIVE VIEW 8 - VIEW EAST ON ASHLEY ROAD



Woodcote Mews
Chequers Lane
Walton on the Hill
Tadworth, KT20 7ST
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NOTES

REV	DESCRIPTION	DATE	IN

FINACHEM HOUSE & 4
ASHLEY ROAD, EPSOM,
KT18 5AX

Rendered Perspectives
Sheet 2

CLIENT: MACMO DEVELOPMENTS LTD

PROJECT NUMBER: MC1/105/1

DATE: 04/10/2022DRAWN BY: CG

DRAWING SCALE: NTS @ A3

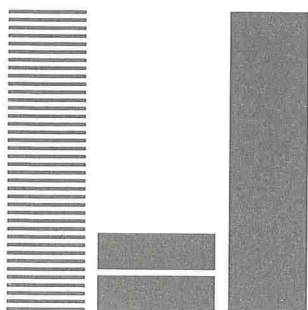
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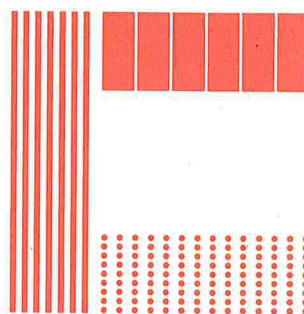
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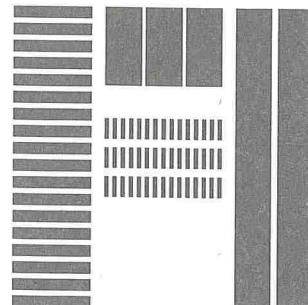


University
for the
Creative Arts

Canterbury
Epsom
Farnham
Rochester



Mr Martin Morris
Gavil Group
Crown Mews
Chequers Lane
Walton on the Hill
Tadworth
Surrey
KT20 7ST



28 October 2022

Dear Martin

RE: 2-4 ASHLEY ROAD, EPSOM

Further to our discussions, we acknowledge the efforts by your team at Gavil Group to address the shortage of suitable accommodation for students within Epsom town and would broadly welcome the provision of purpose-built student accommodation. This is without prejudice to the design and specifications for your scheme, which will need to be agreed with the local planning authority. The purpose of this letter is to set out UCA's position as part of your forthcoming pre-application discussions with Epsom and Ewell Borough Council.

University for the Creative Arts (UCA) is a creatively focused institution and has developed a unique relationship with the community in Epsom. UCA is recognised as a global authority on the creative industries. Our industry partners include Facebook, Apple and Ogilvy Mather and our Epsom Campus is home to the UK's first Business School for the Creative Industries. UCA is considered one of the top specialist creative universities in the world and attracts home, EU and international students from many nations.

UCA has an ambitious growth strategy as a university, which includes the Epsom Campus, and we anticipate an increase in the student population over the next decade. This growth would bring about substantial benefits to Epsom town centre and the entire borough.

An important aspect of the growth strategy is to ensure that there is adequate accommodation to support the growth in student population. There is a shortage of good quality student residential accommodation in Epsom, such that many of our students rely on the private rental sector, or commute into Epsom from farther afield. An increase in the supply of purpose-built student accommodation (PBSA) is therefore a vital element which will help to ensure that students live in accommodation which is appropriate to their requirements. This will also reduce pressure on the existing housing stock within the town and enables students to learn, live, travel, and socialise in a highly sustainable way.

Your site on 2-4 Ashley Road is approximately 200 meters from our Epsom campus and in close proximity to the town centre with its restaurants, cafes, shops and transport links. This will be a very desirable location for our students.

We note that Gavil Group has provided much needed accommodation to UCA students since 2003, including the design and build of two schemes in East Street providing 198 rooms and ancillary accommodation.

UCA has been liaising with Epsom and Ewell Borough Council on the development of the proposed Town Centre Masterplan as well as the preparation of the Local Plan. It is crucial that the needs of UCA as a key stakeholder in Epsom are included within the emerging proposals, which will further enhance its status as a university town.

Please note that our broad support for this proposal does not imply agreement to any lease arrangements, which are subject to further discussions. I trust the above is self-explanatory but please do not hesitate to contact me should you have any queries.

Yours sincerely



Dr Akin Oluwatudimu MCIOB MAPM
Director of Estates & Facilities

DD telephone: 01252 892873
Mobile: 07771 887154



Finachem House - 2-4 Ashley Road

Appendix 2 – Pre-application Response – September 2023

Andrew Black Consulting on behalf of Gavil Group

September 2025

Development Management Service



Mr Curt Guven
Macmo Developments Ltd
Unit 5
Woodcote Mews
Checquers Lane
Walton-On-The- Hill
Tadworth
KT20 7ST

Enquiries to: Ginny Johnson
Email: VJohnson@epsom-ewell.gov.uk
Ref No: 22/01708/PREAPP

8 September, 2023

Dear Mr Guven,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

2/4 Ashley Road, Epsom, Surrey, KT18 5AX

PROPOSAL: Demolition of existing buildings at 2/4 Ashley Road and construction of new 7 storey 130 bedroom student accommodation block.

Please accept the following information as advice from Epsom & Ewell Borough Council regarding the development proposals at 2/4 Ashley Road, Epsom, Surrey, KT18 5AX. The advice is given following consultation with relevant colleagues and our meeting on 14 June 2023.

The Site

The Application Site ("Site") is located at 2 – 4 Ashley Road, within the Epsom Town Centre. It comprises two buildings.

The documentation submitted with this request does not clarify what the existing buildings are currently in use as. During the pre-application meeting, the Applicant explained that Finachem House (2 Ashley Road) comprises an office at ground floor, with a HMO above and 4 Ashley Road comprises a foot clinic. This would need to be clarified by the Applicant with any future planning application.

The Site is designated:

- Within Epsom Town Centre boundary
- As an Archaeological Site
- Within a Great Crested Newt Impact Risk Zone.

The Site is not listed, nor is it within a Conservation Area. It is near to Epsom Town Centre's Conservation Area and Ashley House, which is Grade II* Listed (to the north of the Site).

Recent Relevant History

There is no recent or relevant planning history relating to the Application Site.

Relevant Policies

The proposal has been assessed against the relevant policy background:

National Planning Policy Framework 2023

Section 2	Achieving Sustainable Development
Section 5	Delivering a Sufficient Supply of Homes
Section 7	Ensuring the Vitality of Town Centres
Section 8	Promoting Healthy and Safe Communities
Section 9	Promoting Sustainable Transport
Section 11	Making Effective Use of Land
Section 12	Achieving Well-Designed Places
Section 14	Meeting the Challenge of Climate Change, Flooding and Coastal Change
Section 15	Conserving and Enhancing the Natural Environment
Section 16	Conserving and Enhancing the Historic Environment

Core Strategy 2007

Policy CS1	Creating Sustainable Communities in the Borough
Policy CS3	Biodiversity and Designated Nature Conservation Areas
Policy CS5	Conserving and Enhancing the Quality of the Built Environment
Policy CS6	Sustainability in New Developments
Policy CS8	Broad Location of Housing Development
Policy CS9	Affordable Housing and meeting Housing Needs
Policy CS11	Employment Provision
Policy CS12	Meeting Community Needs
Policy CS16	Managing Transport and Travel

Development Management Policies Document 2015

Policy DM4	Biodiversity and New Development
Policy DM5	Trees and Landscape
Policy DM8	Heritage Assets
Policy DM9	Townscape Character and Local Distinctiveness
Policy DM10	Design Requirements for New Developments
Policy DM12	Housing Standards
Policy DM19	Development & Flood Risk
Policy DM21	Meeting Local Housing Needs
Policy DM22	Housing Mix
Policy DM25	Development of Employment Premises
Policy DM34	New Social Infrastructure
Policy DM35	Transport and New Development
Policy DM36	Sustainable Transport for New Development
Policy DM37	Parking Standards

Plan E Epsom Town Centre Area Action Plan (2011)

Policy E2	Housing Capacity in the Town Centre
Policy E5	Town Centre Employment Floorspace Provision
Policy E7	Town Centre Building Height
Policy E9	Public Realm
Policy E10	Improving Accessibility and Facilities for Cyclists
Policy E11	Deliveries to Premises
Policy E12	Town Centre Parking

The Issues are discussed as follows:

- Principle of development
- Design
- Heights
- Quality of Accommodation
- Neighbouring Amenity
- Access and Parking
- Landscape and Biodiversity
- Sustainability and Climate Change, Landscape and Biodiversity
- Fire Safety

Proposal

The proposal seeks to demolish two existing buildings and construct a purpose-built student accommodation block, for use by the University of the Creative Arts (UCA).

The proposal seeks a 7 storey building, comprising 130 student bedrooms, of which are classified as accessible bedrooms, spread across 20 cluster flats. The building would incorporate space at ground floor for the storage of refuse arising from the development, 62 bicycles, associated plant, and laundry room provision.

Externally, the Site would provide soft and hard landscaping, as well as five car parking spaces, of which one is classified as an accessible space. The car parking spaces are not intended to be used by the student residents, but would provide space for maintenance operatives to attend the Site and serve arrival of the students residents at the beginning of the academic year, and their departure at the end.

Presumption in favour of sustainable development

Paragraph 11d of the NPPF is engaged via footnote 7 in circumstances where Local Planning Authorities cannot demonstrate a five-year housing land supply. The practical application and consequence of this is that unless a site is in an area or involves an asset of particular importance that provides a clear reason for refusal, then planning permission must be granted, unless it can be demonstrated that any adverse impacts demonstrable outweigh the benefits, when assessed against the NPPF as a whole.

Currently, the Local Planning Authority cannot demonstrate a five-year supply of housing land. The evidence shows that the Borough has a significant lack of housing land supply that is available, developable and deliverable.

As per paragraph 34 of the NPPG, the provision of student accommodation would contribute towards the Council's housing land supply. This is a scheme benefit.

Principle of development

Employment uses

Policy CS11 sets out that losses of employment land will be resisted within Epsom town centre. Regeneration of employment premises and intensification of employment uses will be encouraged.

Policy DM25 sets out that Epsom Town Centre is the most sustainable location for new office facilities and other higher density employment uses.

Plan E sets out that the Borough has insufficient employment floorspace, especially modern serviced office accommodation, to meet future population growth and reduce the reliance upon job opportunities beyond the Borough's boundary. Consequently, a key objective is the retention, enhancement, and intensification of existing provision, particularly at highly accessible locations. Plan E does set out that to take account of potential changes to the employment market, the Council would consider appropriate alternative commercial uses that are compatible with the wider Town Centre location.

Town Centre

Policy SC11 sets out that losses of employment land will be resisted in the strategic employment areas of Epsom Town Centre. Regeneration of employment premises and intensification of employment uses will be encouraged in these locations.

Policy CS14 sets out that measures to improve Epsom Town Centre, including new development, will be encouraged, especially where it helps to reinforce and adapt its role in meeting the needs of the local community, acting as a focus for a range of activities.

Development should contribute to the following key objectives for the Town Centre:

- Creating a diversity, richness and balance of uses, which will contribute to a flourishing day-time and night-time economy, help satisfy community needs and enhance environmental quality and sustainability
- Ensuring that physical and land use changes recognise and build on the distinctive character of Epsom town centre and contributes to conserving and developing a "sense of place"
- Improving the pedestrian and cyclist environments by creating new links and developing a street network
- Ensuring the town has a clear spatial structure for future growth and change and that development can be used to protect and enhance that pattern
- Developing a greater sense of safety and security for users, both during the day and at night, and improving the perception of the town as active, inclusive and safe.

Student accommodation

Policy E1 sets out that in principle, Town Centre uses will be permitted within the Town Centre boundary, subject to other relevant policies. These uses will include retail, employment, higher density housing and community facilities. Mixed use proposals are encouraging, although single use schemes will be permitted where it can be demonstrated that they would make a positive contribution and would not harm the vitality and viability of the Town Centre.

Policy E5 sets out that within the Town Centre boundary, the loss of existing employment space will be resisted. Proposals that seek to redevelop aging upper floor office accommodation for retail, other commercial A class uses, or non-commercial uses would be considered provided that (inter alia) the existing office use has been subject to an active marketing exercise lasting at least 12 months, prior to alternative uses being considered.

Officer comment

The submitted documentation does not clarify what the existing buildings are in use as. But during the pre-application meeting, the Applicant explained that Finachem House (2 Ashley Road) comprises an office at ground floor with a HMO above, and 4 Ashley Road comprises a foot clinic. This must be clarified at planning application stage.

The Site is located within Epsom Town Centre, where there is a preference for Town Centre uses to be located. Offices are classified as a main town centre use within the National Planning Policy Framework (NPPF), but student accommodation is not. Student accommodation is also not considered a Town Centre use within Plan E.

A key objective of local planning policy is to retain office use within the Town Centre. Active marketing, to demonstrate that an office use is no longer required and that an alternative use may be appropriate, is a requirement of local planning policy. This would be required as part of a planning application, to justify the loss of office use at the Site.

The National Planning Policy Framework (NPPF) sets out that development proposals should optimise the potential of a Site. To improve Epsom Town Centre, local planning policy encourages development that contributes towards creating a diversity, richness and balance of uses, which contribute to a flourishing day-time and night-time economy. The Site is highly sustainable, and it is likely that student accommodation would contribute towards a balance of uses. The Applicant would be required to submit a Need Assessment with a future planning application, to justify the need for student accommodation within the Town Centre.

Design and heritage

Policy

Policy CS5 sets out that high quality and inclusive design will be required for all developments. Development should create attractive, functional and safe environments, reinforce local distinctiveness and complement the attractive characteristics of the Borough and make efficient use of land and have regard to the need to develop land in a comprehensive way.

Policy DM8 sets out that the Council will resist the loss of Heritage Assets and every opportunity to conserve and enhance them should be taken by new development.

Policy DM10 states that development proposals will be required to incorporate principles of good design. Development proposals should be adaptable and sustainability designed, subject to aesthetic considerations and incorporate the principles of safe design to reduce the risk of fear of crime.

Policy DM13 refers to Building Heights. This policy is given reduced weight, since it was considered to restrict opportunities for growth in the Borough, decided by the Licensing and Planning Policy Committee, in May 2018.

Policy E7 sets out that the areas where there are opportunities for higher buildings, up to a maximum height of 16 metres are indicated on the Proposals Map. Elsewhere within the Town Centre Boundary, buildings will be a maximum of 12 metres. In accordance with the Proposals Map, the Site falls outside of the “higher zone”.

Officer comment

The drawings submitted with this request are indicative. The proposed building is 7 storeys in height, with a finished roof height of approximately 20 metres above ground level.

The Council's Conservation and Design Officer formally commented on this request, setting out that the proposal is too tall for the Site's context and of insufficient architectural quality. Specific comments are provided below:

Heritage assets

The setting of adjacent heritage assets need to be carefully considered and protected. Further details of how to do this are given in Historic England's England's guidance: The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning Note) It is recommended that a Design and Access Statement references this, as part of a future planning application.

Designated heritage assets within the immediate setting of the Site include:

- Ashley House, Grade II* Listed. A detached three storey Georgian house with a smaller Georgian house attached.
- Epsom Town Centre Conservation Area. A Conservation Area Appraisal providing details of character can be found on the Council's website.

Demolition

There is no objection to the proposed demolition of the two buildings, as neither are covered by heritage protection, or have particular townscape value.

Height

Measured heights of buildings, rather than storey numbers are required with a future planning application. The proposed seven storey building in a 3-4 storey building area is unjustified within townscape terms. The proposed building would loom over neighbouring buildings, appearing as a massive, solid block, which would be out of context and highly intrusive in this relatively low-rise area. There is a strong objection to such an alien height and form.

Building line and massing

There are concerns that the proposed building is too close to the pavement on both sides. This would prevent adequate landscaping and would make the building more imposing and intrusive within the townscape. There is concern regarding the bulk of the building, which would be much more solid and imposing than the two existing buildings and would have little meaningful articulation or architectural interest as currently proposed.

Design, details, and materials

The design of the proposal is at an early stage, so drawings are indicative at present. A very high standard of architectural design and elevational language for this prominent Site close to the entrance to the Town Centre and near to Epsom Town Centre Conservation Area.

Officers encourage the appointment of an Architect with interesting ideas for a contemporary design. Officers advise them to use elements found locally to give the building a sense of its place, and to avoid a building that could be anywhere, as is

currently proposed. Epsom has a strong history as a spa town and links to the races. Materials and details used in the most characterful buildings in the area include red brick, timber, painted weatherboarding, clay tile hanging, gables, bays. Innovative use of these ideas would anchor the building to Epsom. Officers query the verticality in the current design, as the building wraps around a corner, perhaps visual horizontality would lend itself better to this Site, especially if the height is lowered.

A Townscape and Visual Assessment, including short and longer views, must be carried out, to inform the design of the proposal. This would be required to be submitted with a future planning application.

Quality of Accommodation

Student accommodation is not required to accord with National Described Space Standard, but the proposal should provide high quality accommodation, with good aspect, outlook, and lighting conditions. There was some discussion surrounding more appropriate location of windows to account for aspect, orientation and access to sunlight as well as privacy though it was noted that the layout and dimensions of the rooms presented some limitations with flexibility in the design. Ground floor units may be overlooked by passing pedestrians and further consideration is required to ensure some building separation from the footpath.

Neighbouring Amenity

Policy DM10 sets out that development proposals should have regard to the amenities of occupants and neighbours, including in terms of privacy, outlook, sunlight/daylight, and noise and disturbance.

Any future scheme should ensure that it safeguards the amenities of occupants, and neighbours. Initial considerations are that the scheme suitably relates to the surrounding area in terms of ensuring adequate building separation to prevent dominance, direct and unacceptable levels of overshadowing or loss of privacy.

Access and Parking

Policy CS16 encourages development proposals to (inter alia) minimise the need for travel, be appropriate for the highways network, provide appropriate and effective parking provision (both on and off-site) and ensure that vehicular traffic generated does not create new or exacerbate existing on-street parking problems, nor materially increase other traffic problems. All major developments should be well located for convenient access by non-car modes, including walking, cycling and high quality public transport.

Policy DM36 sets out that to secure sustainable transport patterns across the Borough, the Council will (inter alia) prioritise the access needs of pedestrians and cyclists in the design of new developments and require new development to provide on-site facilities for cyclists as appropriate, including showers, lockers and secure, convenient cycle parking, in accordance with standards.

Policy DM37 sets out that developments will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions.

The Site is in a sustainable location and is well connected. It therefore may be capable of supporting a reduced level of car parking, as proposed, but the acceptability of this would

need to be demonstrated by the Applicant. The Applicant is strongly encouraged to engage with SCC Highways within pre-application discussions.

The Applicant is encouraged to explore an acceptable refuse strategy. Epsom & Ewell Borough Council's waste team would be formally consulted on a planning application, at application stage.

Sustainability, Climate Change, Landscape and Biodiversity

Policy CS3 sets out that the biodiversity of Epsom and Ewell will be conserved and enhanced through the support for measures which meet the objectives of National and Local biodiversity action plans in terms of species and habitat. Development that is detrimental to the Borough's biodiversity will be minimised, and where it does take place, adequate mitigating measures should be provided. Wherever possible, new development should contribute positively towards the Borough's biodiversity.

Policy DM4 sets out that development affecting any site or building that supports species protected by Law, including their habitats, will only be permitted if appropriate mitigation and compensatory measures are agreed to facilitate the survival of the identified species, keep disturbance to a minimum and provide adequate alternative habitats to ensure no net loss of biodiversity.

Policy DM5 sets out that the Borough's trees, hedgerows and other landscape features will be protected and enhanced by (inter alia):

- Planting and encouraging others to plant trees and shrubs to create woodland, thickets and hedgerows; and
- Requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include the planting of new semi-mature trees and other planting.

The Council has a Climate Change Action Plan, to guide future policy development to higher levels of sustainability. New developments, specifically major developments of a substantial scale, should seek sustainability improvements, provide steps to be carbon neutral and present biodiversity enhancements.

Landscaping, ecological and biodiversity enhancements are considered a key aspect of any future proposal at this Site. Officers would expect proposed buildings to integrate well into their surroundings, with landscaping playing an important role in aiding this. A landscape proposal would be required as part of a future planning application at the Site, integrating a new building into the urban fabric. Necessary Ecological Reports must accompany a planning application.

The application would likely be considered at Planning Committee and members would seek sustainability measures well in excess of policy requirements. This would include PV solar panels on the roof, heat pumps, EV charging and building designs such as overhangs to provide summer shading and winter sun.

Flood Risk and Drainage

Policy DM19 sets out that development within Flood Risk Zones 2 & 3 or on sites of 1ha or greater in Zone 1 and sites at medium or high risk from other sources of flooding will not be supported unless (inter alia) it can be demonstrated through a site Flood Risk

Assessment that the proposal would, where practical, reduce risk both to and from the development or at least be risk neutral.

The Applicant must prepare and submit appropriate documentation with a future planning application, to demonstrate that the proposal would not give rise to flood risk or drainage issues.

Fire Safety

A Fire Strategy should accompany a future planning application, produced by a suitably qualified assessor. This should consider (but not limited to):

- the building's construction: methods, products and materials used, including manufacturers details
- the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- features that reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building, ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

Conclusion

The submitted documentation does not clarify what the existing buildings are in use as. But during the pre-application meeting, the Applicant explained that Finachem House (2 Ashley Road) comprises an office at ground floor with a HMO above, and 4 Ashley Road comprises a foot clinic. This must be clarified at planning application stage.

A key objective of local planning policy is to retain office use within the Town Centre. Active marketing, to demonstrate that an office use is no longer required and that an alternative use may be appropriate, is a requirement of local planning policy. This would be required as part of a planning application, to justify the loss of office use at the Site.

The Site is highly sustainable, and it is likely that student accommodation would contribute towards a balance of uses. The Applicant would be required to submit a Need Assessment with a future planning application, to justify the need for student accommodation within the Town Centre.

A specific design approach or details have not been developed, so not submitted with this request. But, the Council's Conservation and Design Officer has provided comments for review. At present, there is an objection to the height of the proposed building, its bulk, its positioning within the Site and its design. The scheme should be developed taking into consideration site constraints and key views, in accordance with best practice methodology.

Student accommodation is not required to accord with National Described Space Standard, but the proposal should provide high quality accommodation, with good aspect,

outlook, and lighting conditions. Adequate private and communal amenity space should be provided within the scheme.

The Site is in a sustainable location and is well connected. It therefore may be capable of supporting a reduced level of car parking, as proposed, but the acceptability of this would need to be demonstrated by the Applicant. The Applicant is strongly encouraged to engage with SCC Highways within pre-application discussions. The Applicant is encouraged to explore an acceptable refuse strategy. Epsom & Ewell Borough Council's waste team would be formally consulted on a planning application, at application stage.

New developments, specifically major developments of a substantial scale, should seek sustainability improvements, provide steps to be carbon neutral and present biodiversity enhancements. Landscaping is considered a key aspect of any future proposal at this Site, and it must ensure ecological and biodiversity enhancements.

Application Process

Should you wish to submit an application, you would be required to submit a planning statement and robust supporting documentation with your planning application. The Council will make every effort to ensure that the advice given in the pre-application process is as accurate as possible. However any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to any future planning applications and, whilst it may be a material consideration, it cannot be held to bind the Council in its formal determination of a subsequent application.

It should be noted that the weight given to pre-application advice notes will decline over time. Advice for schemes submitted more than 1 year after the date of issue will not be valid. Please do not hesitate to contact the relevant case officer to discuss any points raised above.

Yours faithfully

Ginny Johnson

Planning Officer
Epsom & Ewell Borough Council