

Mark Berry BA(Hons) MRTPI DMS  
Head of Place Development



Ms Horton-Baker  
Surrey County Council  
Planning & Development Group  
County Hall  
Kingston upon Thames  
Surrey KT1 2DY

Town Hall  
The Parade  
Epsom  
Surrey  
KT18 5BY  
Main Number (01372) 732000  
Minicom (01372) 732732  
www.epsom-ewell.gov.uk  
DX 30713 Epsom

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Your Ref SCC Ref 2016/0186  
Our Ref 16/01319/CMA

Contact Mr J Mumford  
Direct line 01372 732382  
Fax 01372 732388  
Email jmumford@epsom-ewell.gov.uk

Dear Ms Horton-Baker,

**Site:** Ewell Grove Infant and Nursery School, West Street, Ewell, Surrey  
KT17 1UZ

**Proposal:** Expansion of existing 2 FE Infant School with 26 FTE Nursery to include the demolition of existing nursery, reception and shed buildings and erection of a new Key Stage 1 building on the West Street frontage together with a part two storey and part single storey extension to the existing school building with associated access improvements, amended staff parking, removal of trees, landscaping including new hardstanding and drainage infrastructure.

Thank you for notifying Epsom and Ewell Borough Council in respect of the above planning application. I apologise for our delay in response.

We have the following comments:

Epsom and Ewell Borough Council support the County Council's endeavours to deal with the school place shortage that we have in the Borough and welcome the proposed investment in Ewell Grove Infant and Nursery school. We do however have a number of concerns as set out below.

#### Heritage and Design

It is not considered that the design response has been sufficiently informed by the significance of this part of the conservation area, nor the setting of a number of listed buildings, individually and collectively. When considering the pattern and grain of development, including its scale, form, mass, materials and detailing, including relationship to the street, the proposed new building does not appear to be informed by that which is significant about the immediate context, this part of the street scene, nor the relationship with the main school building or neighbouring listed buildings. The existing main building has a presence that will be detracted from because the new building will become the dominant element both within the site and in the street scene and in our view, not a positive element. It may well seek to reflect the two storey scale of the domestic buildings

to the north east but it fails to demonstrate that it is informed by local distinctiveness. In particular the roofing detailing and gable feature of the new classroom block facing onto West Street are not in character with the nearby buildings and would fail to make a positive contribution to the quality of the built environment.

Although partially screened by the new building, the extension to the main school building compounds the inappropriateness of the approach adopted. Where new meets old, we can clearly see how the extension jars - although in a perhaps 'contemporary' manner, its scale, form, massing, pattern of fenestration and indeed scale of openings has failed to respect the main school building and failed to harness opportunities to take positive cues from that building.

It is therefore considered that the proposed new build element and extension would individually and cumulatively cause harm to the site itself, the main school building - a non-designated heritage asset and the character and appearance of this part of the conservation area.

Overall it is considered that the harm is 'less than substantial' as defined by paragraph 134 of the NPPF but at the higher end of that scale. As such any level of harm must be given considerable material weight and consideration when carrying out the planning balancing exercise. It is suggested that at the very least a review of the elevation detailing should be undertaken and/or reserved by planning condition.

#### Trees and Landscaping

The proposed development involves the removal of a significant group of mature trees that occupy a central position in the campus. These trees are all native species and potentially have good ecological value. The trees scheduled for removal in this group are 5 trees classified as B category trees, under the British Standard (5837) cascade chart for tree quality assessment. These trees are T1, T2 and T6 - 3No. Ash, T5 a Whitebeam and T4 a Bird Cherry. B category trees are higher grade trees which are normally considered desirable to retain. B category trees normally act as a constraint on a sites development potential. It is therefore surprising that Babcock 4S should conclude they are dispensable. We agree with the B category quality assessment made by Babcock 4S, the trees have no observable defects of any structural or physiological significance, in essence the trees are perfectly healthy good specimens. We, however, strongly disagree with Babcock 4S's assessment that removal of the trees will have a low impact on amenity and we feel they have seriously underestimated the trees landscape importance. The group of trees are dominant in the back-land and have a strategic value in softening the built form around the site. The tree group is clearly visible from West Street, especially where the public foot path crosses to The Grove. In addition the tree group can be seen from wider views, from between buildings in Ewell High Street and from even wider views (than probably realised) for example from the area east of Ewell central car park where the taller trees of the group can be seen above the building skyline as a backdrop feature.

Far from having a minimal impact on amenity it is our view that the loss of the tree group will result in significant harm to amenity. This tree group connects to other trees in the school grounds and to trees in the Grove which collectively provides a good sylvan character to the area. In our view all five trees of this group would probably be worthy of a Tree Preservation Order. Currently the tree group provide important green infrastructure that separates the harsher contours of the school buildings. The proposed school extension significantly increases the mass of the built environment and loses the natural visual relief provided by the trees.

We are concerned that the new hall and kitchen would be too close to the Austrian Pine T8. This is a large dominant specimen. The stem diameter of this tree is measured as

710mm which gives a root protection area to a radius of 8.4m. The building would need to be sited the full 8.4m from the tree to ensure there is a harmonious spatial separation and the tree does not come under threat by being overly dominant to the building at close proximity. We are concerned that as proposed there will be future pressure to remove this tree because of this close relationship. There also appears to be a risk that the Pine could suffer root severance as a result of underground service installation.

The proposed new footpath passes well within the root protection areas of trees T33, T26, T25 and T8 and is likely to cause damage if not constructed using no dig techniques and be formed of a flexible rubberised surface.

Too much of the root protection area of the Cedar T35 is proposed to be covered by hard play surfacing. It is advised that the hard surfacing should be moved a further 2m away from the tree.

It is suggested that the Leyland Cypress tree T7 is removed as it will be difficult to maintain into the future and obstructs too much light into the garden area.

Objection is raised to the revised landscape plan that omits the planting of trees on the West Street frontage. This tree planting is considered essential to at least help offset the loss of T51 and possibly other trees on the site and to enhance the leafy character of West Street and soften the expanse of hard landscaping provided by the playground and the proposed mass of school buildings. The tree planting will need designing with adequate planting pits in the ground to give sufficient root volumes so the trees thrive and damage to the playground surface is avoided.

#### Residential Amenity and Car Parking

This Council has received a number of local resident objections relating to the additional traffic and on-street parking that will occur especially at peak times. It is considered particularly important that the off-site mitigation measures set out in the submitted Transport Assessment together with the arrangements set out in the Framework School Travel Plan are implemented fully to minimise the impact on surrounding residents, local traffic conditions and to provide a safe environment for parents and pupils. This Council would wish to be further consulted on the details of the School Travel Plan proposed to be reserved by condition.

Yours sincerely,



Mark Berry  
Head of Place Development

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