## **How Green is My Mole Valley?**

All green belt sites could be removed from Mole Valley's plan for homes following proposed changes to planning at central government level. A specially-called meeting of the district council will be held this month to discuss asking the government inspector looking at the authority's local plan her opinion on removing the sites.

The council's local plan, which sets out where and when 6,000 homes will be built in the district up to 2037, was put on hold in December when **Michael Gove** announced changes to housing targets at central government level.

A consultation is now running on plans to update the National Planning Policy Framework, closing on March 2.

The council's leader Councillor **Stephen Cooksey** (Lib Dem, Dorking South) said along with four other members of the council's cabinet, he had called for an extraordinary meeting of the council on January 16.

The council will be asked to consider seeking the inspector's view on removing all green belt sites from the draft local plan. While many of the new homes were planned for towns like Dorking and Leatherhead, green belt sites had been released to ensure the authority could reach its housing targets set by central government.

Residents and councillors had raised concerns about developments in rural areas as well, and the impacts they could have on communities, roads and infrastructure.

The council's cabinet member for planning, Cllr **Margaret Cooksey** (Lib Dem, Dorking South) said changes to planning policy removed the "central direction" of housing numbers and the need to develop the green belt in order to meet them. She added: "If the inspector agrees with our proposed process, as we hope she will, this can be achieved by introducing a major modification, which would allow the plan to proceed to the next stage of consultation on all the proposed modifications."

**BBC Local Democracy Reporting Service** 

[Ed: Epsom and Ewell Times hope to bring you an update on the position with Epsom and Ewell's Local Plan next week as we await news from the Borough Council.]

## **Epsom Hospital multi-storey car park rises**

A Planning Inspector has allowed **Epsom and St Helier Trust** to go ahead with a 6 level car park at **Epsom General Hospital**. Despite the plans rejection by local councillors and over 100 local objectors resisting. In a key section of the published decision (6th December) the Inspector stated:

"Overall, the institutional character of the hospital site strongly contrasts with the character of neighbouring residential areas. Accordingly, the wider hospital site, including the appeal site is appropriately recognised in the 2008 Environment Character Study 2008 as having its own unique character (Area 35E). This area is described as having a low sensitivity to change and relatively low ratings in terms of townscape quality and value. The proposed multi-storey car park would be notably taller than the immediately adjacent elements of the hospital building and would form a new, sizeable and somewhat bold structure at the edge of the wider hospital site. In many respects the proposed design is honest, reflecting that it would be a structure which results from its function. The design and scale, however, would be compatible with the wider utilitarian character of the hospital site within which it would be principally read. It would readily relate to the scale and height of the taller buildings on the hospital site including the consented backdrop of the Guild Living scheme. Accordingly, the multi-storey car park would appear as a logical and coherent consolidation of the built form in the unique host character area."

In short, the implication is that as the hospital site is as a whole rather ugly, more ugliness is not objectionable. The Inspector goes on to observe:

"Despite the proposed height and massing there are relatively few public perspectives in which the proposed structure would be readily experienced. The principal ones would be from the site frontage to the hospital complex on Dorking Road and across the open sports ground from Woodcote Road. The proposed structure would also be highly visible from the public footpath connecting Dorking Road to Woodcote Road where it passes adjacent to the appeal site. However, in all of these places the multi-storey car parking building would be primarily experienced in the context of the adjacent modern, large hospital buildings described above. In those main views from Dorking Road and Woodcote Road it would be seen at some distance, dissipating any visual effects arising from its bulk and height at the edge of the hospital site. For users of the footpath adjacent to the site there is scope to install hedging along the boundary as part of the landscaping for the appeal site, as found elsewhere on the path, mitigating to

some degree the visual effects from the proximity of the height and scale of the structure."

While acknowledging that there would be harm to neighbouring conservation areas he stated: "The scale of harm, however, would be significantly moderated by the existing impact of the hospital buildings on the setting of these conservation areas. The existing hospital complex would form the principal context and backdrop in which the car park structure would be experienced in the limited public views identified from within the Conservation Areas".

On the question of encouraging commuting by car there appears to be a paradox. The Inspector stated "Overall, the modest uplift in total parking provision would not be excessive or unduly encourage significant or unnecessary additional car-based trips to the hospital." [Emphasis supplied.] He goes on: "In the round the appeal proposal would generate environmental benefits over existing conditions in terms of reducing queue lengths and associated emissions and through the significant provision of vehicle charging points as part of the necessary transition to a lower carbon future."

To read the full appeal decision Click HERE

Related reports:

Epsom Hospital car park appeal

Epsom Hospital's multi storey carpark wrong on many levels?

# All change in Surrey's County Town?

**Guildford** town centre is going through some huge changes, with developments taking place on the sites of some former big names and plans to open up the riverside. The LDRS\* has broken down the areas which will see new homes built, and how the town centre will be changing over the coming years.

Guildford's town centre masterplan sets out the future vision for the town, including developing the town's underused sites around North Street and hundreds of new homes. New homes in the town have been put forward as the more sustainable option, with shops, facilities and public transport all within walking distance and a need in the area for lower-priced homes. But the amount of affordable housing has been an issue on some developments, with developers citing rising construction costs and lengthy planning processes meaning schemes are no longer able to offer high numbers of affordable homes, if any.

We round up some of the biggest developments below and how they will change the face of Surrey's county town.

### **Debenhams**

A planning application for nearly 200 homes on the former Debenhams site was narrowly approved by councillors on November 22. The development will see the old store knocked down and two new buildings replacing it alongside shops, a riverside walkway and possibly a boutique cinema. Councillors approved the controversial plans by six votes to five, debating the limited amount of affordable housing and the flood risk, with the Environment agency ultimately satisfied with measures put in place to reduce the risk of flooding. This site will be a key part of the town centre redevelopment and opening up the riverside for the public.

### **Train station**

In February 2018, planning permission was granted on appeal for developer Solum's £150million regeneration of the land around Guildford Station. The borough council had refused the application because of concerns about the development's impact on the Grade II\* listed St Nicolas Church, among other things. The Station Quarter when complete will include a new station building, more than 400 homes, as well as shops and office space. The developer's website highlights £25million of station improvements including a multi-storey car park and new plaza with shops and cafes.

### **Old Orleans restaurant**

The former restaurant next door to the Odeon cinema is currently empty and the council, as the owner of the site, has no current plans to lease it out. Councillor Tim Anderson (Residents for Guildford and Villages, Clandon and Horsley), the authority's lead councillor for assets and property, said it would not be cost-effective to lease it in the short-term while there were plans to develop the building. He added: "The full plan for the Bedford Wharf area, including this site, forms part of the emerging town centre masterplan, Shaping Guildford's Future. Proposals are that the land will support a wide mix of uses. It will support the town centre with new homes, jobs, community and service spaces."

### **North Street**

The area around North Street has been called the "poor relation" to the town's picturesque high street - just don't call them

cobbles. The redevelopment of land around the bus station, including the refurbishment of the bus station itself, could bring nearly 500 new homes and part-pedestrianise North Street. Plans originally put forward in December 2020 included 700 homes, this has steadily been reduced after public consultations, as has the height of the buildings in the scheme. The tallest building has been reduced from 14 to 13 storeys and the second tallest from 10 to nine storeys. A video on the developer's website shows public squares, restaurants, and new shops and cafes as part of the plans, which should be considered by the council's planning committee in January 2023.

### Wisley airfield

While it's not within Guildford town centre, the proposed new town which may be built on the former Wisley Airfield could still have an impact. Campaigners have raised concerns about how local village roads will cope with traffic from the residents of the proposed 1,700 homes. The new town would be around a 20 minute drive down the A3 from Guildford, and a similar distance from Woking. The site is also just over a mile from the A3's junction 10 with the M25, where junction upgrade works have started.

It may be just another reason to look again at Guildford MP **Angela Richardson'**s calls for the A3 to tunnel under Guildford to help with traffic and pollution, as she called for in Parliament in December.

An outline application for the plans will come to the council's planning committee in 2023.

North street "fly through" video by developers: https://www.northstreetregeneration.co.uk/virtual-flythrough.html Solum webpage on station development: https://www.solum.co.uk/development/guildford/

\*Epsom and Ewell Times BBC partner - Local Democracy Reporting Service.

Related reports:

Tunnel vision for Surrey's A3?

Housing plan flying in the face of opposition

# Gove gives pause for thought on Local Plans?

A **Surrey council** has paused its plan for 6,000 homes after central government changes which could mean lower housing targets. Mole Valley District Council has paused its local plan saying it would be "unwise" to carry on with the process in the face of potential changes at a national level.

The authority released some green belt sites in the district for new homes, in a plan that was examined by government inspectors between January and October.

Image: Councillors-and-residents-concerned-about-Mole-Valley-Local-Plan. Emily Coady-Stemp

A local plan sets out a council's policies and sites for homes and infrastructure, with Mole Valley's setting out plans until 2037. Changes from central government are expected to be announced before Christmas, with Secretary of State for Levelling Up, Housing & Communities and Surrey Heath **Michael Gove** outlining in a letter earlier this month (December 5) that more control should be given to councils and local communities.

Councillor Margaret Cooksey, cabinet member for planning on the district council, said the council would pause its local plan process until it had a better understanding of what government was saying. Cllr Cooksey (Lib Dem, Dorking South) said in a statement the decision had not been taken lightly and given the progress made during an "exhaustive" examination of the plan, that pausing the plan is not what the council wanted to do. She added: "However, it would be unwise to carry on when we are not sure what the wider national planning policy situation is so we have committed to wait until such time that the Inspector can advise us on what should be done next. We had been due to consult with stakeholders on the modifications proposed by us and the Inspector in January. We remain hopeful that clarity will be provided and we will take the best course of action for our residents."

Mole Valley's only Green councillor, **Lisa Scott** (Charlwood) said she wanted clarification on what "pause" actually meant, calling for the plan to be "fully reviewed" when national policy had been revised. She said: "We wholeheartedly welcome the change in housing numbers required by government, which was leading to huge green areas being sacrificed to questionable house building targets and are very pleased to see that the local plan has been paused." But she raised concerns about areas of green belt still being included in the submitted plan, claiming some had been been "significantly expanded" from the public consultation stage, so residents could not have their comments considered by the council.

She said possible changes also meant more brown field sites could be included and the types of homes could be reassessed, with terraces and town houses being more efficient to heat and cool than detached homes.

A letter from Michael Gove sent on December 5 said the changes would mean communities would "have a much more powerful incentive to get involved in drawing up local plans". While he said planning would always start with a number of homes required in an area, though it should be and "advisory starting point" and not a mandatory figure. He added: "It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area – be that our precious green belt or national parks, the character or an area, or heritage assets."

The majority of homes in the local plan as it stands would be built in Leatherhead and Dorking but there was also concern about communities in rural areas being "ruined" in areas such as Hookwood where more than 550 homes were planned over four sites.

At the February meeting of the council where members voted to submit the plan, the administration promoted its maintaining of 99.3 per cent of the district's green belt in the local plan.

### Related reports:

Epsom and Ewell last in Local Planning
MP's housing solution for Epsom and Ewell
Labour Councillor moves on housing

Local Plan Battle: early skirmishes on Downs Farm

## Local Plan Battle: early skirmishes on Downs Farm

As **Epsom and Ewell Borough Council** is expected to publish a draft **Local Plan** in February 2023 **Epsom and Ewell Times** carries below an opinion piece authored by the **Keep Epsom & Ewell Green Belt Group**. We cannot confirm these campaigners' contentions but we are happy to stimulate public discussion and interest through our pages. The Local Plan will shape for several years to come the decisions on new housing development locations in the Borough.

#### Opinion Piece:

Alarmed by well-sourced leaks, residents have decided to come out fighting early against joint landowner and developer discussions with Epsom & Ewell Borough Council (EEBC) to build hundreds of homes on the 110-acre Downs Farm, destroying forever one of the closest Green Belt sites to London.

Other Green Belt sites near Epsom's Hook Arena and Horton Farm are also believed to be earmarked housing in the Local Plan process, and it is even feared that other areas within Epsom's 42% of Green Belt land could also have been offered up and included.

Residents in Surrey's already highest populated borough are so concerned that they are not waiting for what they say could be a flawed consultation process, expected in February.

Under Government pressure to deliver nearly 700 homes for each of the next 20 years, planning officers and councillors should instead be prioritising developer partnerships for an imaginative alternative "brownfield" core scheme, claims the residents' campaign group.

However, following much-publicized Government climbdown guidelines announced this week by Secretary of State, Michael Gove, that top-down housing targets were to be "advisory only" and could be challenged by local authorities if the character of their area would be irrevocably changed, EEBC should be in no doubt, say residents, that Green Belt sites should be now removed from its Draft Local Plan.

By redeveloping the Kiln Lane/Longmead area closer to town centre facilities, "more starter and lower cost young family homes could be built – and bring much needed rejuvenation and job opportunity benefits. Yet there is little sign that the planners are engaging with developers on this opportunity, preferring the easier, but devastating, option of

building higher end housing on Green Belt fields."

The borough-wide residents' campaign, "Keep Epsom and Ewell Green Belt" involves social media, mass leaflet drops, a new petition (https://www.change.org/EpsomGreenBelt) and its own website(https://epsomgreenbelt.org/). Some residents may well

stand as independent Green Belt candidates in the May elections.

'Our advice is that once a site has been publicly designated as suitable by the Council in the Local Plan, public consultations rarely change what are perceived as "done deals" – and we are not simply prepared to stand by and let that happen. In 2019, EEBC listed Downs Farm as a Green Belt site not suitable for development, yet it now appears to conveniently ignore this just because the site has been offered up to them' said Yufan Si, campaigner of Keep Epsom and Ewell Green Belt.

Downs Farm is a rare chalk grassland habitat for protected species such as skylarks and bats, with regular sightings of deer, redkite and pheasant.

"Destroying forever high quality Green Belt sites will result in mainly luxury houses. We are deeply disappointed that the Residents Association controlled EEBC appear set to prefer Green Belt desecration over redeveloping a core brownfield scheme in central Epsom. Properly phased, this could be promoted as a creative industries hub, focussed on the town's University of Creative Arts centre for excellence. As well as a much better mix of around 5,000 affordable starter and rented homes for young families, this would provide job opportunities in a much-needed Epsom rejuvenation."

The campaign group also points out keeping Green Belt spaces also helps sustainability and the UK commitment to net zero by 2030.

The Elmbridge Council Local Plan is cited as an example where the council and residents challenged unrealistic top-down government housing targets. It proposes redeveloped brownfield sites without any Green Belt destruction - despite having a greater proportion of Green Belt land (57%) than Epsom.

The residents' campaign urges EEBC planners to quickly engage with brownfield developers using a £75,000 grant recently announced by the Government. Given its overriding remit to only prefer Green Belt development in "exceptional circumstances", and the recent Government policy rethink on housing, this should be done before the draft Epsom Local Plan is issued in February, say residents.

"Keep Epsom and Ewell Green Belt" Campaign Group - for further information contact epsomgreenbelt@gmail.com

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Special Correspondent June 7, 2022

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# Auriol school field for golden years?

Auriol School sports field in Cuddington is earmarked by Surrey County Council for 50 elderly care housing units. According to SCC: "The Cuddington site is ideally situated for Extra Care Housing and has been selected specifically for its location. The site will provide new homes in the form of 1-bedroom self-contained apartments. All of the homes will be accessible, with features designed for wheelchair users.

The accommodation has been designed around the constraints of the site and its neighbours but is still able to offer residents ready access to safe external space including landscaped gardens designed expressly to address the needs of older people; encouraging activity and promoting exercise, healthy living and wellbeing.

The design focuses on ensuring residents have sufficient space, both private and communal, and key to this have been considerations around accessibility. The development has been designed to ensure residents can remain in their homes as they grow older and/or as their needs change."

SCC have plans for three other sites in the County. **Mark Nuti**, Surrey County Council's Cabinet Member for Adults and Health, said: "Our ambition is to bring affordable extra care housing to locations around Surrey and these four sets of proposals bring us a step closer. Not only would the schemes help older people live life to the full, they would also breathe new life into four community sites."

SCC is holding a consultation exercise and if you want more information and to participate go to:

Cuddington Extra Care Housing (communityuk.site)

# MP's housing solution for Epsom and Ewell

Epsom and Ewell and indeed the whole country has a real shortage of homes. We cannot go on with a generation of young people who aspire to home ownership but have little hope of achieving this. And we must have more affordable homes locally.

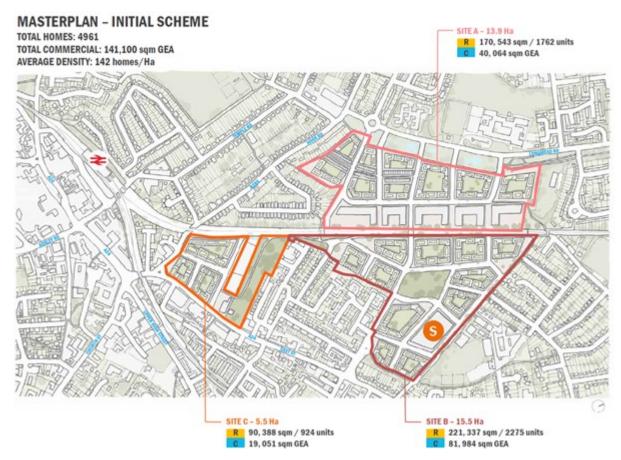
As a country we are already now building more homes than at any time for decades, but there is still more to do. Locally precious little has happened in recent years. Four years ago, just before the local elections, the Borough Council was due to publish its plan for housing and for the area for the future. It was postponed then, and only now is the Council in the process of publishing and developing its local plan for the area for the next 10-15 years.

Every local authority is obliged to do this, and to explain how it will meet housing need, look after its local economy and protect its local environment.

Each council has also prepared an assessment of local housing need, based on national guidance of how to do this. The housing assessment for Epsom and Ewell is though impossibly high – as it is in some other places. It would mean building more than 10,000 homes locally, and inevitably would mean much of our green belt disappearing.

That is why on a national level I have been saying to Ministers that there has to be more flexibility for Councils based on the reality in their areas.

But here we do need to do all we can to meet the housing need and not nearly enough has been done on this locally in recent years. That's why I have proposed a comprehensive redevelopment of the **Kiln Lane** and **Longmead** areas to achieve this without building all over our green belt.



My plan, which has been developed together with a leading firm of architects, involves the construction of a mixed use area of well-designed developments, with businesses on the lower floors and flats above, with some terraced housing on the site as well. This kind of mix is typical of what is being done elsewhere. The buildings would be no higher than those already in and around the town centre.

The scheme provides a similar amount of commercial space to the present plus nearly 5,000 homes. The plan would be to have car showrooms and parking areas built upwards rather than at ground level across large areas of land. But over time I would expect the commercial space to attract more creative businesses, given the presence in Epsom of the **University of the Creative Arts** which is now one of the country's leading institutions of its kind. It would also aim to provide more homes for younger people, meaning more could afford to stay locally and work here, rather than simply building more executive homes for commuters on open land.

And being close to the town centre, I hope it would provide a much needed boost to the businesses there.

I hope that as the local plan develops the Council will adopt this plan. I think it's the best way forward for our area.

# **Epsom and Ewell last in Local Planning**

**Epsom and Ewell Borough Council** (EEBC) has approved a delayed timeframe for the development of its new **Local Plan**, putting it behind both government targets and other Surrey councils, amid debate over greenbelt development.

On 21st November, EEBC's Planning Policy and Licensing Committee unanimously approved a **Local Development Scheme** (LDS), which sets out a timeframe for the development of its new Local Plan that would see the planning authority miss a government target by more than a year. The Local Plan will set out planning policies and sites that may be developed in the borough up until 2040.

The LDS supersedes the version approved by the council in April, and delays the first stage in the development of the Local Plan

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by three months. It forecasts that the Local Plan will be adopted in Spring 2025. In an agenda paper, the council's interim Chief Executive **Jackie King** pointed out that "the government will want to see progression against their target date of all Local Planning authorities having an up-to-date Local Plan by the end of 2023."

In 2017, the Government made it a legal requirement for Local Plans to be updated, and if necessary updated, every five years. Epsom's current planning framework consists of four documents dated between 2007 and 2015. The council has said that the national period of mourning following the death of Queen Elizabeth II caused delays because councillor briefings were rescheduled. Ms King also said that there were delays "to allow further member briefing sessions to be undertaken to enable members to fully engage with and help shape the Local Plan."

At the committee meeting, Councillor **Julie Morris** (Liberal Democrats, College Ward) said: "The period of mourning was three weeks, and yet we have a three-month delay." She added that it was "regrettable" that the committee's chair, Councillor **Steven McCormick** (Residents Association, Woodcote Ward), had "put a lot of effort in trying to get councillors to attend briefing sessions" but that "at least one has had to be re-run because of lack of attendance." She continued: "There is a communication failure. Councillors outside the committee do not realise the importance of the document, give it the deference it deserves, or give their views."

The new LDS means that EEBC will be the last local council in Surrey to adopt a new Local Plan, with the exception of Woking Borough Council and Banstead and Reigate Borough Council, who said their plans did not need updating.

Surrey district/borough council	Pre-Publication Stage - Consultation. (Regulation 18)	Publication of Submission Draft Local Plan (Regulation 19)	Submission and Examination of Local Plan (Regulation 22)	Adoption
Elmbridge		Ran from June-July 2022	Scheduled for Winter 2022	Scheduled for Summer 2023
Epsom	Scheduled for Feb- March 2023	Scheduled for Feb- March 2024	Scheduled for June 2024	Scheduled for Spring 2025
Guildford			Part 2 submitted June 2022	Part 1 adopted April 2019. Part 2 scheduled for March 2023.
Mole Valley			Submitted February 2022	Scheduled for Spring 2023.
Runnymede				Adopted July 2020
Spelthorne		Ran from June-Sep 2022	Scheduled for Nov 2022	Scheduled for Sep 2023
Surrey Heath	Ran from March- May 2022	Scheduled for Jan- Feb 2023	Scheduled for June 2023	Scheduled for Dec 2023
Tandridge			Submitted January 2019	Scheduled for Oct-Dec 2023
Waverley				Part 1 adopted February 2018.Part 2 was scheduled for Sep-Oct 2022.

<sup>\*</sup>Woking Borough Council declared that its plan was up to date in October 2018. Reigate and Banstead Borough Council declared its plan up to date in June 2019.

There has also been debate about developing on greenbelt land in the borough. Greenbelt land includes areas of countryside that are protected from development in order to prevent urban sprawl and encourage development within existing built-up areas. A member of the public attending the committee asked what the council was doing to preserve greenbelt land, and if it would "pause greenbelt development and research brownfield development" as an alternative. Brownfield sites are areas of land that have previously been used for development but are not currently in use.

Councillor **Steven McCormick** said that the council "should follow government policy in its approach to greenbelt". Government policy is that greenbelt land should not be altered except in exceptional circumstances. Councillor McCormick said: "If alternative options are considered, it is sufficient to release greenbelt land to meet housing needs".

Councillor Morris said she wished to clarify that the council had "sympathy" with what the member of the public asked. She added: "But it's too early. There is every intention of not overdeveloping the borough. It may be that we don't go for these plans, but the evidence is needed. It's too early to say what we'll arrive at."

No draft of a Local Plan has yet been made public. In a recent email to constituents, Epsom and Ewell MP **Chris Grayling** said that he expects "the Borough Council to publish its initial thinking about the plan shortly". He wrote: "We clearly have a need for new homes locally. There are too many young people who grow up or are educated here but cannot afford to remain in the area. And we have a serious shortage of social housing." He added: "My worry is that developing the green belt is an easy option for the Council. It is always more complicated to reorganise what has already been developed than to build on a green field, but in our area it is much better to take the more difficult approach."

Gina Miller, leader of the True and Fair Party, who has announced that she will run against Grayling in the next general election, criticised his comments on Twitter. She wrote: "Not surprising but disappointing that Chris Grayling backed abolishing housing targets, making it nigh on impossible to help young people onto the property ladder nationally, whilst calling for new homes in Epsom & Ewell".

The first stage in the development of the Local Plan, which includes consultation with residents, is now scheduled for February-March 2023.

See earlier reports on The Local Plan:

Local Planning Matters

The Local Plan to plan The Local Plan

BBC misreports Epsom and Ewell planning?

Another £1/4 m to plan planning

## Timeo Danaos et dona ferentes..?\*

Battle for school gets classical with fears of a Trojan Horse. **Kingswood House School** in **Epsom** is asking local people to join hundreds of residents in opposing plans to evict the School from its site and replace it with a small school and housing estate. With objections numbering over 400, local people have risen up in opposition to developer **Steve Curwen**'s plans to evict the 102 year old, 245 pupil school from its site in West Hill, Epsom. **Curwen Grou**p are working with the landowners, the **Aczel brothers**, with the scheme involving the construction of a small school of only 60 pupils with acute special needs.

It is anticipated that the school would be privately operated on a "for-profit" basis. In what has been described by MP **Chris Grayling** as: "an example of the worst form of business practice", the Aczel brothers have confirmed that the planning application for the new school will be followed by a second application to build a housing estate on the current school's playing field.

Amongst its 245 pupils, Kingswood House School is home to 172 local children with special needs and has the highest concentration of special needs pupils at any school in Surrey. The School has been made an Asset of Community Value by Epsom and Ewell BC in recognition of its contribution to the local community.

The School has now filed a detailed objection to the proposed development including reports by independent experts. These documents which are publicly available on the Council's website include a report by educational expert **Neil Roskill**y, a former member of the General Teaching Council for England and adviser to the Department for Education. Roskilly notes that "...none of the pupils at Kingswood House School would qualify for a place at the proposed new school because their special needs would not be considered sufficiently severe: and the need in Surrey is for schools catering for milder special needs (such as Kingswood House) not acute special needs and therefore the new school would be marketed by its owners towards pupils from outside Epsom."

Roskilly says that **Department of Education** design guidelines for schools accommodating pupils with acute special needs have been ignored, resulting in classrooms and common areas being too small and that: "... as designed the proposed school would have to operate with a limited curriculum". As such, Roskilly believes that: "...it is highly doubtful that the proposed school would

receive permission to open from **Ofsted** at a post-registration inspection. This is because it would be potentially discriminatory and in breach of the: "Special Education Needs and Disability Code of Practice: 0 to 25Years (2015)", which states that all SEND pupils should have access to a broad and balanced curriculum".

Access for the proposed new school would be via West Hill Avenue, currently a quiet residential road to the rear of the Kingswood House School. Transport consultants **Markides** note that the proposed access and parking arrangements are inadequate given the width of West Hill Avenue, its use for residential parking and the presence of trees restricting visibility. When combined with the intended housing estate and inadequate staff and visitor parking for the proposed new school, Markides conclude that: "... the proposed access and internal layout are regarded as seriously deficient and unsupportable."The problems identified don't stop with those spotted by Markides and Roskilly.

Officers employed by **Surrey County Council** and **Epsom and Ewell Borough Council** have identified problems relating to both flood risk and ecology. The Surrey County Council Flood Risk, Planning and Consenting Team have reported that they are: "...not satisfied that the proposed drainage scheme meets the requirements..." of the relevant planning legislation and that development should not commence: "....until details of a surface water drainage scheme have been submitted to and approved in writing by the planning authority".

Curwen's own ecology reports recommended further reports, not yet done, to establish the presence or otherwise of protected species, Great Crested Newts and Bats. Surrey's Ecology Officer notes that these reports are still not done and that: "These surveys are required and cannot now be done until spring/summer next year".

A common concern amongst the hundreds of objections filed so far is that Curwen's scheme is in reality a sham and a "**Trojan horse**" for the construction of a housing estate. This concern is only likely to have been intensified given the fundamental flaws in the scheme's design exposed by experts for Kingswood House School's and the shortcomings noted by Surrey County Council's Flood Risk team and Epsom and Ewell Borough Council's Ecology Officer.

#### A **Spokesperson** for The Curwen Group said to **Epsom and Ewell Times**:

"We are committed to providing a specialist SEND school at the Kingswood House site, and are currently working though technical responses to our application in consultation with the surrounding community.".

Those wishing to support or object should do so via the Council's website tinyurl.com/epsomewellplanning and entering the reference number 22/01653/FUL or by email to the case officer, Gemma Patterson at gpatterson@epsom-ewell.gov.uk (ref 22/01653/FUL)

\*The Trojan priest Laocoön guessed the plot and warns the Trojans "I fear Greeks, even those bearing gifts".

## Neighbouring crematorium plan goes up in smoke.

Reigate and Banstead borough council has shelved its plans for the area's first crematorium despite having spent £350,000 on the project so far. The facility could have brought in more than £1.5million for the authority, but was rejected by councillors at a planning meeting in September 2021, despite the officer recommendation to approve it.

A decision then had to be taken whether to submit another application, proceed with a third party partner or appeal the decision, though it was then discovered the council could not appeal its own planning decision.

Reigate and Banstead Borough Council's commercial ventures executive sub-committee considered a report into "project baseball" on Thursday (November 17) which detailed the closure.

The project, first brought to committee in December 2019, would have provided the borough's first crematorium, and has been funded by the council through its reserves, or savings. Plans were refused at planning stage because of its location in the greenbelt, with more than 500 public objections to the application.

Council documents show the aim of the project was to provide a much needed and greatly improved level of service to the residents, while also bringing in income for the authority. More than 80 per cent of of dead people were cremated in the UK as at 2021, and facilities in neighbouring boroughs were found to be operating beyond their capacity.

Documents said: "[They] were not considered to serve customers, and particularly local people, well at a difficult time of life, either in terms of service, cost, environment and location/accessibility." They went on to say the crematorium would aim to deliver "a higher quality facility and service" than the nearest competitors, closer to residents and those near the borough, and also bringing money in for the council.

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Operating at full capacity, it was estimated the crematorium could have brought in more than £1.5m per year.