

Epsom Civic Society

formerly Epsom Protection Society

shaping the future, safeguarding the past

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Head of Planning,
Epsom & Ewell Borough Council,
Town Hall, The Parade,
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KT18 5BY

14 December 2013

Contact Officer: John Mumford

Our Ref: ECS/RHA/13-14

Dear Sir,

13/01082/PDCOU. Nelson House 1A Church Street Epsom Surrey KT17 4PF. Prior approval for the conversion of the existing first, second and third floor offices (B1a) into 3 self-contained studio residential apartments (C3).

The Society recognises the commercial and economic imperatives driving proposals such as this, that they are currently supported by central government policies and that local Planning Authorities have little, if any, control over them. However, we feel compelled to put on record our extreme concern about the potential for 'housing' coming onto the market which fails to reach basic standards in terms of their floor area, of which we feel this is an example.

The proposed 'studio residential apartments' have a gross internal area (GIA) of about 28 sq.m. Apart from the shower room, no storage facilities are shown and no indication is given as to how the rest of the space (about 24 sq.m.) might be used for cooking, eating, living and sleeping.

It is understood that there are no extant rules for regarding the area which must be provided for satisfactory living accommodation. However, there are examples of good practice providing recommendations for the minimum which should be provided.

The relatively modest Parker Morris standards of 1961 gave the following minimum areas for a one-person flat: 320 sq.ft. for living, plus 8 sq.ft. for internal storage and a further 20 sq.ft. for external storage, a total of 348 sq.ft. or 32.3 sq.m. More recent examples are the London Housing Design Guide which gives a minimum of 50 sq.m. GIA for a one bed dwelling and 'Sustainable Urban Housing: Design Standards for New Apartments' (Dublin, 2007), which gives a recommended minimum of 45 sq.m (or 38 sq.m. excluding storage). It is of interest to note in this connection that a recent application (13/01096/FUL) makes use of the London Housing Design Guide in support of a proposal for a new one-bed flat. Although this application does not provide the overall area recommended, the drawings show storage and the possible arrangement of furniture which show that the proposal is viable.

It is to be hoped that the Council is able to find the means of preventing cases such as this permitted development from reaching the market. It is patently absurd that as things stand, any unused office space, no matter how small, can be converted to residential use. The worst cases are likely to become the slums of the future.

Yours faithfully,

For Epsom Civic Society
Robert Austen

cc Town Ward Councillors

