Epsom Civic Society

shaping the future, safeguarding the past

Head of Planning, Epsom & Ewell Borough Council, Town Hall, The Parade, Epsom, Surrey, KT18 5BY 22, Devitt Close, Ashtead, KT21 1JS

23 April 2015

Contact Officer: Karen Haizelden Our Ref: ECS/RHA/14-12

Dear Sir,

14/01863/FUL. Kings Lodge 28 Church Street Epsom Surrey KT17 4QB. Formation of a new vehicular and pedestrian entrance to Kings Lodge from Downside.

The conversion of Kings Lodge and Charles Stuart House under the General Permitted Development Order will provide 12 flats. The access is intended to provide for the six new flats at Kings Lodge. The rationale, need and justification for the new access are unclear, although may be explained at least in part by paragraph of the Design Statement which states that proposed access is 'part of a larger request including a proposed two dwellings alongside Kings Lodge'.

Under its previous use as an office, this development would have generated many more peak hour vehicle movements than would 12 flats. This is evidenced by the office car park which accommodated at least 21 vehicles. The need for an additional access thus cannot be supported by such issues. It may be that a future application for more development on the site – as might be implied from the Design and Access Statement - might necessitate an additional access, but this should more properly be considered as part of that future application in due course.

At present there can be no justification for an additional access. Indeed, it is clear that this would be highly undesirable. The Technical Note which accompanied the application makes a brave attempt to support the new access, but acknowledges that the carriageway of Downside is restricted to an effective width of only 2.5 metres in this location and that it operates is effectively as a one-way street. The Note does not mention that there is only a single, very narrow, footpath, or that this road makes a very useful route for pedestrians avoiding Church Street. It does mention that there are no recorded accidents, but

this is not unusual in locations such as this where the road is so obviously well below standard, with its narrow width, poor sight distances, a single narrow footway and house entrances opening directly onto the highway.

We were surprised to note that a comment was received that the new entrance would 'contribute positively to an active street scene, which is to be encouraged'. The Society would support such a statement in general, but it is clearly misplaced here. A residential area might gain from greater pedestrian movement, but additional traffic can hardly be supposed to help by adding noise and fumes and worsening an already difficult highway situation, which would clearly benefit only from a reduction in vehicle use rather an increase, no matter how modest that increase might be.

Under these circumstances, the Society is of the view that the application should be refused on the grounds of non-compliance with Core Strategy Policies CS1, CS5, CS16 and retained policy BE5.

Yours sincerely,

Robert Austen for Epsom Civic Society

