

# Epsom Civic Society

shaping the future, safeguarding the past

[www.epsomcivicsociety.org.uk/](http://www.epsomcivicsociety.org.uk/) | email: [chairman@epsomcivicsociety.org.uk](mailto:chairman@epsomcivicsociety.org.uk)

Facebook: EpsomCivicSociety | Twitter: @EpsomCivicSoc

Ruth Ormella MRTPI  
Head Of Planning  
Town Hall  
Epsom  
KT18 5BY

17<sup>th</sup> Sept. 2019

Dear Ruth,

## **Ref 24-28 West Street, Epsom: Planning Application 19/01021/FUL**

Epsom Civic Society strongly objects to this Planning Application for the erection of a 13 Storey residential block and ground floor commercial and retail units. The application includes the demolition of the existing building and clearance of the site.

We have previously written to you in October 2018, regarding the outline planning application 18/00940/OUT. That application was for the demolition of the existing building and construction of a 5 storey building with commercial/shopping and 14 flats. We stated in our letter that the demolition of the building would deprive this area of its well established distinctiveness and the proposal would destroy this piece of Epsom history.

The proposed development is located within Area 2 of the extension to the Epsom Town Centre Conservation Area. This part extension was specifically for its protection. We note that due to the high rise nature of the proposed development that there would be a severe effect on the adjacent Stamford Green Conservation Area. This development proposal completely conflicts with what our Conservation Areas stand for and promote. Local planning authorities have a duty to define why an area has been designated as a conservation area, to outline its special interest and publish proposals for its preservation and enhancement. The control of development in conservation areas requires that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." (S.72 Listed Buildings and Conservation Areas Act 1990). We do not believe that the Developer (Quanta Homes) or the Council have taken these duties into account during the joint advancement of this major scheme.

Speaking at last year's launch of the Building Better, Building Beautiful Commission, Kit Malthouse MP, then Housing Minister, spoke of the Government's aspiration that in the delivery of new homes, we should also be building the conservation areas of the future. It is difficult to discern how the current proposal could make a meaningful contribution in that direction, its negative impact on two existing conservation areas regrettably all too evident.

The obvious problem is the sheer bulk and height of the proposed building. All of the other recent residential blocks in Station Approach are 5 storeys. Few of these have architectural merit and the flats opposite the railway station have the unique reputation of being compared with 'eastern Europe construction'. The council should be ashamed of permitting such a development. The

proposed height and density of this building is not compatible with the current Epsom Local Plan including core strategies, and although we note that although this plan is currently being reviewed it should still act as the guide for current applications.

The proposed height of the building produces several challenges, which we feel have not been adequately addressed in the Planning Section of the proposal. These are:-

- The overlooking and privacy of the gardens and properties to the west of the railway. These are located in the Stamford Green Conservation area. All balconies to the overlooking flats from the 3<sup>rd</sup> floor upwards ie the height of the railway embankment, should be screened off. Other measures could include treated windows. The privacy of the residents in these western roads is severely compromised.
- The tower block will produce a climate vortex eg wind gusts at pavement level. A nearby example of this climate problem is the Tolworth tower. The applicant should have prepared and submitted a construction meteorological report stating how this key challenge has been addressed within the design.
- The over-shadowing caused by the 13 storey tower. This will affect residents to west and north ie in Stamford Ward and Marshalls Close/Horsley Close areas. The applicant should have prepared and submitted a 'Sun Path' map showing the shadow effect throughout the day and the range of the properties trespassed.
- The height of the proposed tower when viewed from West Hill is prohibitive and unpleasant. This view conveniently has been omitted from the proposal documents. This view would show the foreground green landscape of West Hill being cut by 10 storeys of the tower predominantly rising above the railway embankment. This perspective should have been prepared and submitted by the applicant.

We understand that in the joint development of this proposal that the Council have relaxed the ruling re **car parking** spaces. Whilst we realise that basement car parking provisions and access costs would be prohibitive there will be an effect on the area. At present the new flats are shown as 'quality' design, which will attract purchasers/renters who require the use of a car. Albeit that the building is next to the railway station we suggest that the new tenants will park in the local roads to the west of the West Street railway bridge. This situation should not be allowed and alternative parking should be included within the design. High density flats in central London can usually omit car parking but Epsom does not have the same transport infrastructure to facilitate this regime.

The Society are concerned at the poor social and community aspects of this proposed development. There are no designated play areas, community areas and social spaces.

We are concerned that not all aspects with regard to the proximity of the **railway** have been considered. We note that early discussions have been held with Network Rail regarding possible Cross Rail 2 works. But there are also other concerns. These are:-

- Access rights of Network Rail to adjacent land. See Access Rights (Section 14 of The Railway Regulation Act 1842).
- The noise and vibration caused by the trains. Extra sound insulation should have been considered in the designs.
- The adjacent foundation designs should include the embankment loadings plus the live train loadings. This may well necessitate piled foundations and retaining walls.

- Construction technique limitations including tower crane oversail and base designs, construction plant and operative safety.

Initial discussions should have been held with Network Rail by the applicant for the site. There is no evidence of these included in the planning submission. We suggest that the outcome of such may affect the building design specifications.

We are also aware that there are unsuitable conditions (or insufficient consideration) for cyclists using Station Approach. At present, **cyclists** are permitted to proceed westwards along Station Approach. This is against the traffic flow (eastwards). The location of the proposed tower block and its reception access from Station Approach may affect the safety of the cyclists. The current arrangement has been agreed by SCC Highway Engineers and should at the least be included in the Design & Access Plan.

We are very concerned at the prospect of carrying out any **construction works** in this location. An outline Construction Management Plan should have been included in the Client's submission. This is a pre-requisite within the application documents and should state their proposals for the following:-

- Site construction access
- Vehicle turning and tracking paths
- Tower crane location and jib oversail
- Environment considerations including noise, dust
- Site set up & site hoarding locations
- Pedestrian safety including closed off pavements and crossing points
- Railway asset protections.

It is noted that within the Submission documentation prepared by the applicant, there is a Pre-Application Engagement describing the 'matters of principle agreement'. This clearly describes the extensive input and joint working with the Council on this high density scheme. This has obviously meant that a great deal of time and expense has been made by the applicant and his team and Epsom & Ewell Council. Therefore we are concerned that this Application is being presented as a 'done deal' with only the opportunity for minor modifications.

Within the documentation there is a referral to this scheme being a town cornerstone, which leads to us being concerned about other high rise town centre blocks blighting our area. Permitting this development risks setting an unwelcome and damaging precedent for Epsom's character and identity as a modern market town, and renders conservation area designation toothless. This would lead to Epsom to becoming very similar to Sutton/Croydon in its skyline. We trust that is not what the Council seeks to achieve?

Therefore in the strongest terms ECS object to this Planning Application. We suggest that the Council could seek other ways of achieving the Government's housing targets without such devastating effect on the nature of Epsom's character, heritage and conservation areas. Key to the retention of Epsom's identity, the Town Centre Conservation Area is an asset that with the necessary support from Epsom BID and others could be used to increase footfall, attract to new brands in the town, and retain local distinctiveness. Shaping the future is a challenge. Cherishing our conservation areas is not inimical to change, but deploying a brutal intervention such as proposed in the present application is not, in our view the way forward and should be refused.

Yours sincerely,

Margaret Hollins Chair, Epsom Civic Society

cc All Ward Councillors

