

Epsom Civic Society

formerly Epsom Protection Society

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Ruth Ormella MRTPI
Head of Planning
Town Hall
EPSOM
KT18 5DY

9th September 2019

Dear Ruth,

Planning Application 19/00929/FUL: Wells Social Centre Spa Drive Epsom KT18 7LR

Demolition of existing Wells Social Centre and construction of 23 residential units, community hall, playground and associated car parking and landscaping

The Society's main concern with this development is the adverse impact on the well-being of people who live on The Wells estate, particularly on Spa Drive, The Crescent, Well Way and The Greenway. Our concern stems from the matters enumerated below.

1. Adverse impact on amenity facilities due to the reduced scale and functionality of the proposed new community hall. The consequent limited provision compared to the existing facility, a valued community hub for 20 years, is stark.
2. The proposed community hall is too small and is comparable with a 'Portakabin'. The Langley Vale compared equivalent facility provides toddlers' groups, yoga sessions, bingo, barn dances and private parties. The Langley Vale hall includes toilets for 50-60 persons including disabled, kitchen, stage platform, parking for 8 cars and is approximately 3 times the floor area.
3. Pedestrian access provisions to the proposed community hall are poor and the unit is located at the rear of the development thus requiring all users to access past the residential areas. The Langley Vale hall allows for persons outside the village to enjoy the facility. Also it has a dedicated safe children's play area at the rear.
4. Inadequate parking provision for the community hall (as proposed) with consequent 'knock-on' effects and increased parking pressure in the surrounding streets. This is in addition to parking pressure from 23 new flats, on-site provision of parking spaces notwithstanding.
5. Insufficient overall car parking provision. Visitors' cars will likely park in Spa Drive and clog the road for emergency services. We observe that on similar new sites eg Longmead, work vans are often owned and are parked in the surrounding streets. Surrounded by Epsom Common, the carrying capacity of the single access road to The Wells will be under additional stress from these proposals.

6. The overall design of the proposed accommodation block is poor and cheap, examples include vertical clay tiles (in lieu of face bricks), ground floor concrete panels, galvanised railings, roof aluminium panels (tin).
7. The playground is insufficient for 23 residential family units, with 40% being affordable. The overall reduction in playground provision for The Wells estate is unacceptable.
8. The proposed accommodation block at a height of 12m (from LG floor) is higher than any other residential buildings in The Wells. The 'bulk' is excessive and will dominate this silvan part of the Wells estate.
9. The landscaping provisions are minimal and many of the existing trees and shrubs have been removed. The end result is stark and not suitable for a family residential area.

Therefore, in terms of facilities, the replacement hall falls short with only one room for activities, compared to the current community hall which enabled multiple activities to operate concurrently. This represents a significant reduction in amenity provision, not only for the immediate community in The Wells estate but also for people from further away who use it. Any new residential units increase the need to provide a community centre of the same (or larger) size as existing.

In terms of form and appearance, the proposed development is at a much higher density than that of the present type of housing at the Wells. We note with some alarm reference to the station redevelopment in the Design and Access Statement - a 'distinct building' according to the surrounding character analysis. That is a redevelopment whose notoriety still resonates with members and non-members of the Society alike, and we would seek to discourage use of the station as an example of an emerging new vernacular in any forthcoming local design code.

The Society is aware of the current housing circumstances imposed on the Council by the present government namely by requiring a high annual new build rate and seeking a five-year land supply of deliverable housing sites coupled with the Council's intention to actively pursue all available urban sites (before seeking release of green belt land). There is also the threat of planning designation by the Inspectorate for lost appeals. Nonetheless the quest for new homes for The Wells estate should not result in a detrimental loss in quality of life for existing residents by the provision of a new community facility that is inadequate to meet community needs. Sharing that loss with new residents makes matters worse.

The Society therefore considers that the Planning Committee should not approve this development since the adverse impacts on the community of granting planning permission would significantly and demonstrably outweigh the benefits. For the avoidance of doubt, these are adverse impacts on residents of The Wells in terms of their health and well-being, social inclusion and community cohesion. This is a relatively isolated community and loneliness of residents is a concern. The Longmead Centre, Sefton Road remains inaccessible for many due to poor public transport links and taxis are not an option for people on limited incomes. These and other community concerns are amply illustrated by the online comments on this application with, at time of writing, 390 objections and only four in support.

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There remains a demonstrable need for a community facility in The Wells estate. The resulting net loss in these proposals is consequently unacceptable. Access to alternative facilities in Longmead is not a realistic option for many, and, so far as we are aware, evidence of marketing to promote the current facility to a wider audience has not been forthcoming (Local Policies CS13 and DM 34 refer). National policies (NPPF February 2019) support the promotion of healthy and safe communities (paragraphs 91-95). We also recall the words of Lord Scarman in the Great Portland Estates case (1985) that, "It would be inhuman pedantry to ignore the human factor." This factor, the Society respectfully submits, is in danger of being ignored if this application were approved.

In terms of achieving well-designed places (NPPF paragraphs 124 – 132) we note especially paragraph 127, quoted in part: "Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); ... f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience." The current proposals fall short, in the Society's view, of addressing these requirements in a meaningful way.

The Society is pleased to note the government's framework for stronger communities, as set out in the MHCLG's vision (20 July) which supports, among other things, shared community spaces "where sustainably-run and inclusive spaces are available for people to come together, including ... community centres..." It acknowledges the importance of encouraging an integrated and socially cohesive community and strengthening the community voice in placemaking. Taking this forward, a preferred outcome in this case would be for a reduction in the number of flats provided on the site, and the replacement of a valued facility – the existing Wells Centre – with a new facility of equal use, quality and value. This would enable residents old and new to enjoy and be part of a community that is strong and socially sustainable.

In light of the above, we object to the current application, recommend that the application be refused and request the Council to think again about their proposals.

Yours sincerely,

Margaret Hollins
Chair, Epsom Civic Society

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Cc Councillors, Chris Grayling MP

