Epsom Civic Society

shaping the future, safeguarding the past

25th Sept 2019

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

Dear Ruth,

Ref Woodcote Grove Planning Applications 19/00999/FUL AND 19/00998/LBA

The Epsom Civic Society strongly objects to these Planning Applications for the demolition of the existing Atkins offices and the erection of 115 apartments including the conversion of the listed Woodcote Grove and Stable Block buildings.

The proposed works divide into separate schemes ie :-

- The new 6 storey stand alone building Block F Ashley Road Site
- The Listed Building conversions and new link buildings, Blocks A,B,C,D & E Chalk Lane Site

The main objection is in regard to the present planning permission 14/01150/FUL for the ongoing Atkins new headquarters project. This planning decision required that the existing office blocks shall be demolished and the resultant material removed from site within 6 months of first occupation of the new building and the grass bank and soft landscaping shall be reinstated in accordance with the Landscape Masterplan Drawing. This condition was imposed to ensure that there would be minimal impact on the adjacent listed buildings. The condition to the 14/01150/FUL application should be adhered to and the cleared office site landscaped to suit the south east part of the estate, and also to provide a view of the listed Mansion House building within Woodcote Grove. This would still allow the Listed Buildings conversion scheme to be constructed as a separate project.

The proposed Block F structure is projected 4m forward of Woodcote Grove and would be an additional 6m (2 Storeys) above the existing Atkins office block. Also the new structure positioned 8m closer to the south façade of the listed house. Unfortunately this would present a large bulk of a structure completely over shadowing the Mansion House. This is further compounded by the proposed basement car park which loadings could undermine the existing adjacent house basement and foundations.

The proposed elevation designs of Block F are of a generic style with material specifications that are lacking in any local distinctiveness. The façade designs do not take any account of the adjacent listed buildings nor the Green Belt woodland to the south. The designs are insensitive and the block's intrusion will lead to a diminished pre-eminence of this delightful Designated Heritage Asset. The application for this 6 storey tower block contradicts Planning Policy DM13. This building is completely out of keeping with the surrounding area. We understand that DM13 remains in place

because it is part of the Core Strategy and is meant to protect the characteristics of the borough. This proposal is at a height and density that far exceeds what is acceptable. And is contrary to the Council's own core strategy policy.

We are concerned at the stark nature of the proposed Block F design. The building is 2 floors higher than the new Atkins offices. The balconies and terraces will therefore overview both Atkins and Block E thus giving privacy problems. The new block F is also to the south of these buildings and give a shadow effect suitably demonstrated by the applicants sun path drawing.

We have reviewed the Chalk Lane part of the scheme as a separate site. This is because it is separated for the proposed Block F which is dependant on the Ashley Road access. Blocks A-E need to 'work together' as they depend on access arrangements from a very limited existing entry onto Chalk Lane. We have reviewed this area under the following considerations based on the applicants own Landscape and Visual Impact Appraisal.

1) Designs

- 2) Landscaping
- 3) Car Parking
- 4) User Access & emergency services
- 5) Affect on Chalk Lane and The Conservation Area

1) The proposed <u>designs</u> for the new blocks A,C & D need to be developed to suit the interfacing existing facades of The Stables (Block B) and The Mansion (Block E). At present all pedestrian access including refuse and recycling collections are from Chalk Lane which we suggest is unworkable.

We welcome the change of use for The Mansion House ie being converted back from Atkins offices into residential. However the change from a single house unit into separate flats is fraught with problems. These include fire protection, acoustics, services routes which all could affect the fabric of this old dwelling. There is minimal design information available in this application for us to accept that the design concept actually works.

The opening up of the through passage to Block B (Stable Block) needs to be carefully considered and carried out. There is insufficient design content to view the side elevations of this tunnel.

We do not feel that the proposed designs of the new blocks A,C & D compliment the existing listed buildings and should be more sympathetic with the facades and key features. Also the new material specifications should reflect the adjacent buildings eg face bricks, stone, metalwork, roofs and features.

2) We are concerned that a 2nd vehicle entrance from Chalk Lane not only exposes the awful west façade of the new Block F but removes a number of protected trees. These currently screen off the site and would alter the appearance of Chalk lane, opening it up to public view and exposing the development activities. Further landscape proposals show the felling of trees along the Chalk lane frontage. At present there is a lovely screen of trees projecting above the listed wall giving a nice break from the Pub and car parking. Any reduction in these trees would be unacceptable and any diseased trees should be replaced.

The proposed pedestrian gateway cut through the listed high brick wall onto Chalk Lane is not acceptable. This would completely interrupt the visual curve of this wall and severely cuts the uninterrupted face brickwork. Alternative pedestrian access arrangements could be planned within the site demise.

3) The proposed car parking arrangements for the five blocks is unrealistic. Parking for blocks A, B C & D is adjacent to Block E and there are only 7 spaces allocated. This is completely unacceptable. All

visitors would try and park in the surrounding streets, the inadequacy of which is confirmed by the applicant's own survey. Block E is shown as having 6 spaces, adjacent to the Chalk Lane entrance. This allocation would prove insufficient for visitors and deliveries. We note that there is no pedestrian link to the basement car park of Block F. Chalk lane parking is extremely congested and affected by the Amato Pub operations, St.Martin's School, Epsom Race Days and current local residents.

4) Pedestrian access to Blocks A,B,C&D is shown as all being via Chalk Lane. Due to the land locked nature of Block F ie walking access is only possible along the basement road ramp, then the new residents of Block F will want to use Chalk Lane for their access. This will immensely increase the footfall onto Chalk Lane. The existing footpath is narrow and many walk along the road carriageway. This is a major safety issue for this very narrow and tricky section between the Worple Road junction and the old Chalk Lane Hotel.

We are concerned with the lack of provision for emergency services access to this area of the development. It is highly restricted from Chalk lane and we suggest that an agreed arrangement is achieved through the new Atkins development.

We are also concerned with regard to the stated rubbish removal proposals. These show a management operative moving bins to the Chalk Lane entrance from each individual dwelling.

5) The proposed development has a severe effect on Chalk Lane and The Conservation Area. It must be considered in parallel to the Chalk Lane Hotel residential development, Grumpy Mole pub operations, horse riders, cyclists and ramblers use. The new road access abuts the new hotel works. The increase in traffic to this part of the site will lead to safety issues whilst the new pedestrian foot fall from the whole development will create footpath issues.

The proposed site is in one of the most attractive parts of Epsom, located in The Chalk Lane Conservation Area. Within the introduction summary of the Character Appraisal & Management Proposals it states that "The Chalk Lane Conservation Areas one of the Borough's most important conservation areas .." This appraisal states that the Local Planning Authority has a duty to ensure its future protection and enhancement. We request that the Council standby this duty when considering this application.

We have reviewed the proposed scheme in relationship to the NPPF (Series 3 February 2019) and suggest that the potential impact on the heritage asset (Mansion House and The Stables) has not been adequately achieved. It clearly states that "great weight should be given to the asset's conservation". Due to the height, density and proximity of the proposed Block F, the policy this has not been adhered to.

We understand that a Public Consultation has been held by the applicant and that views were sought from a select invited audience. Unfortunately this session was not open to all interested parties and we suggest that it should be repeated at a bigger venue so that all can participate. Similar proposals have been exhibited at Bourne Hall (eg Lower Mill Project). On reviewing the feedback from the restricted consultation we note that whilst several ideas have been (apparently) incorporated, there remains many outstanding such as improved landscaping, lower Block F height, alternatives to the proposed Chalk Lane access and more car parking provisions on site.

Due consideration must also be given to the carrying out of the construction works. Although it is stated that the main access is via Ashley Road following the excavation of the new Block F basement then all following construction access is cut off to Blocks A-E. At this time all works to these areas would be from Chalk Lane. We are concerned at this situation as it has been proved that this road is not suitable for any large construction traffic. This is due to the narrow junctions, parked cars, horses and pedestrians. We suggest that a construction management plan (CMP) is compiled and discussed

with all residents, school reps, Atkins, Pub, Council and highways. Recently a wall in Worple Road has been demolished by a construction vehicle, hopefully next time it will not be a child !

Therefore in the strongest terms the Society objects to this application and that it should be refused. The impact on the character of this outstanding part of the Borough would be immense, affecting the Conservation Area and the everyday enjoyment of this very constricted area. The proposed works for the 115 dwellings in such a constrained parcel of land means that this is a high density development completely out of keeping with the surrounding area.

Notwithstanding the need to maximise use of all available development as it becomes available, we are forced to conclude that, quite apart from the infringement of the condition attached to permission of application 14/01150/FUL, these proposals constitute an attempt at significant overdevelopment affecting heritage assets in one of Epsom's most important Conservation Areas.

Yours sincerely,

Bob Hollis Michael Arthur

(On behalf of The Epsom Civic Society)

cc All Ward Councillors And Members Of The Planning Committee