

Epsom Civic Society

shaping the future, safeguarding the past

NEWSLETTER No - 162 – WINTER 2019

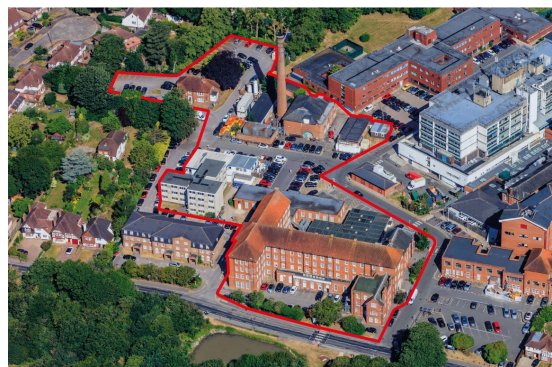
CHAIR'S COMMENTARY

The impending winter festivities afford me the enjoyable opportunity of wishing all members a very happy Christmas and New Year. Thanks to all of you for continuing to support the Society. My fellow committee members and I hope to meet as many of you as possible in 2020, starting **28 January** when we will be hosting an **open meeting at Epsom's United Reformed Church** (details p.8). As members of the Society, you already demonstrate your interest in Epsom's present, its past and, most significantly, its future. Your involvement in shaping our town's transformation is vital and our **key message to all members for 2020** is: **ensure that you have your say in the continuing Local Plan process**. As regular readers of this newsletter will know, the new Local Plan, once adopted, will be the key driver of massive transformational change for the Borough. The more people who contribute their views about the proposed policies in the draft Local Plan, the stronger our community voice will be in helping to make homes and places that people actually want to live in.

Here are some of the Society's concerns about Epsom's future:

- The **housing numbers** for Epsom mandated by the government's standard methodology for calculating housing need will not be achievable even if the upcoming Local Plan is implemented in combination with massive development in the Green Belt. In attempting such a plan, it is likely that the character of the Borough will be irretrievably changed, leading to the Borough being subsumed into London's urban sprawl.
- Current proposals in the Masterplan (part of the evidence base for the emerging Local Plan) give insufficient weight to **Epsom's heritage** because it conflicts directly with the achievement of target numbers of new housing. We believe that this is an 'exceptional circumstance' that mitigates towards a lower housing target. The plan should specifically target maintaining Conservation Areas and historic buildings using the Community Infrastructure Levy (CIL) or other funding to support maintenance of heritage assets. Historic buildings and Conservation Areas can be valuable assets in supporting a rejuvenated retail offer and town centre vitality.
- **Conservation Areas** under threat: three are on Historic England's Risk Register 2019: Epsom Town Conservation Area (condition: poor), Horton Conservation Area (condition: poor), Ewell Village Conservation Area (condition: very bad). We are interested in exploring opportunities for action with relevant stakeholders to restore them. **We support Historic England's responses regarding the current West St and Woodcote Grove planning applications which reflect and amplify our own objections to these proposals.**
- Proliferation of **unacceptably tall buildings** impacting adversely on Epsom's historic character and townscape. The Society's last newsletter highlighted current planning applications (awaiting decision) involving significantly increased building heights in Conservation Areas and elsewhere in the Borough.

We anticipate proposals for a seven storey building on the combined police and ambulance station site in Church Street and a possible 15 storey development on the former hospital site in Woodcote Green (area shown in the image). A linked concern is that the Council's Licensing and Planning Policy Committee's motion overruling previous height and density limits in May 2018 was not consulted upon publicly before its implementation, and **we continue to seek clarification on the Borough's current and emerging policy on height limits and restrictions and underpinning legality.** The petition launched by College Ward Residents' Association on these issues received well over the requisite number of signatures and a full Council meeting is scheduled for 18 December.



- Risk of significant loss of **Green Belt** to new development without reduction in the government's housing target of 579 homes a year for the life of the plan (currently to 2034), particularly as regards proposed (in the Masterplan) new communities and expansion at Ewell East and Epsom Downs stations. The housing target rises to 695 where annual delivery is below benchmark. We consider that the Borough's high proportion of Green Belt (42%) is another 'exceptional circumstance' that justifies a housing target reduction.

The new Local Plan policies will be the prime determinant of how the Borough will change and grow over the next 15 years. Its importance in this respect underlines **how essential it is for a strong local civic voice now to provide meaningful input into its creation so that it reflects community priorities and supports their delivery.** The draft Local Plan will be out for consultation next year. To receive Council updates on progress with the Local Plan, email your details to: LDF@epsom-ewell.gov.uk

More on the Masterplan

The Masterplan current draft is in the Agenda Reports Pack for the Licensing and Planning Policy Committee meeting on 23 September 2019: <https://www.epsom-ewell.gov.uk/news/council-today-publishes-masterplan-future-development-borough>. The term 'Masterplan' can be confusing: it is part of the extensive **evidence base** for the new Local Plan but is not in itself part of that plan. Part A provides an overview of the current local context, and Part B sets out the **Growth Strategy**. Eight key principles underpin the Strategy, with the intention that they are taken forward into the Local Plan:

- Delivering design quality • New development that is 'of Epsom' • An emphasis on green • A family friendly community • Epsom as the urban centre of the Borough • Creating new places and communities • Accessible and supported communities • Better growth, better places, an even better Borough.

The Society supports the eight principles set out in the draft Masterplan but is concerned that they are not fully followed through in the rest of the document nor in proposals or practice in addressing current planning applications. Rather the approach focuses on meeting the target quantity of housing at any cost – and still appears to fail to meet this objective. This is not the fault of the Masterplan itself (produced by Allies and Morrison, Urban Practitioners), rather the **reality facing our Borough**, succinctly set out in paragraph 9.2.3:

“It is apparent that, even if all housing needs were met through developments with an average housing density of 60 dwellings per hectare (dph), a total of approximately 164 Ha of land would be needed, of

which only 46 Ha is potentially already known about. This scenario would therefore still require 118 Ha of land to be found to ensure housing needs are met.”

They continue (paragraph 9.2.5):

“It is very clear therefore that the very best use of urban land, with developments that must exceed prevailing averages, must be made to help meet the very challenging level of housing need facing the Borough. Land beyond the urban area may also be required to help meet this need.”

If ever there is a need to identify, in planning terms, a local ‘elephant in the room’, there is no doubt that the Borough faces extremely difficult, not to say unparalleled, challenges to accommodate this level of housing need in the context of existing constraints.

There will be a need to build at significantly increased densities and heights and at locations outside the urban area. This is why the Society is encouraging members to engage constructively in the Local Plan process and make your views known at an early date.

This is why we are organising a meeting on 28 January to discuss the situation and to hear from you.

Masterplan hierarchy for growth

The Masterplan’s ‘hierarchy for growth’ is based on the underlying principle of identifying the most sustainable and accessible locations best supported by services, amenities and infrastructure. The locations (unsurprisingly) are: Epsom town centre • other centres and stations including Ewell Village and Stoneleigh Broadway, smaller local centres, Ewell East and West stations and Epsom Downs station • principal movement corridors (including A24 and A240) • industrial land / strategic employment sites and thereafter the focus shifts to • Intensification of the Urban Area more generally • the Urban Edge/ Green Belt.

A huge challenge exists to reconcile conflicting aspirations and pressures: for example, more comprehensive redevelopment at train stations by providing higher density residential development presents a challenge when attempting to reconcile with Conservation Area designation, 13 storeys at 24-28 West Street being a case in point for both Epsom Town Centre CA, and for Stamford Green CA (see photos). The Society has long championed good urban design and supports sensitive, progressive evolutionary change. We agree with the Masterplan that, to provide significant growth in the number of homes in the Borough, average height of residential buildings will have to increase over the Local Plan period. But we believe that, to be acceptable to residents and to ensure a gradual transition to a slightly higher skyline, this process must be done incrementally, not by an immediate disproportionate uplift from two or three storeys to 10 or 15 storeys. Where historically established planning standards are set aside, eg in terms of density or heights, we are encouraged by the **Masterplan’s advice that new development “should be of an appropriate scale and grain to sit comfortably within conservation areas within Epsom Town Centre and that the buildings will be constructed using materials that are recognised locally such as the red brick of surrounding Edwardian and Victorian streets.”**



*Top: View from Stamford Green approach to Epsom
Below: The view with the proposed 13-storey tower
development at 24-28 West Street (DAP Architecture Ltd)*

The Society does not, however, seek to clone the past. Indeed, we are desperate to say ‘yes’ to housing that demonstrates good urban design with quality materials that is both contemporary and contextually appropriate. In terms of taller buildings, we have significant concerns regarding fire safety, and potential adverse impact on health and well-being. Nor do we want to "glass-tower the town into sterility" to paraphrase architect Brent Bellamy. What does the Council need to do to create a vision for a better Epsom *and* ensure community support for this significant growth in housing?

Planning Team Meeting

The Society met Ruth Ormella, the Council’s Head of Planning, together with senior members of her team in early November. The extensive agenda covered the Society’s concerns above including current large-scale planning applications, particularly with respect to height, and Conservation Area, heritage and enforcement matters. Thanks to Ruth and her colleagues for a constructive discussion and update. We plan to follow up seeking clarity in writing about the Council’s approach to the legal and democratic process for current decision-making about planning applications.

Celebrations

Members will recall from the Society’s Spring 2019 newsletter that Alan Baker and Malcolm Boyd stepped down from our committee in April after many years’ invaluable service. Fellow committee members and I were unanimous in nominating them for Volunteer Awards and I am delighted to report that they received their respective awards from the Mayor at a ceremony in the Town Hall on 13 November. Warmest congratulations to Alan and Malcolm.

Margaret Hollins

SHAPE EPSOM’S FUTURE!

If you are worried about the development pressures on Epsom and what is going on, then please:

- Tell your neighbours
- Write to your local councillors
- Submit comments on existing applications querying why the Council seems to be encouraging buildings that breach existing plan height limits before consulting on a change of policy
- Come to our open meeting on 28 January
- Join the ECS!

PLANNING APPLICATIONS

22/24 Dorking Road (19/01365/FUL): For the demolition of two 1930s-era detached houses and replacement with a new 3-4 storey building to accommodate 20 flats with basement parking. The Society has objected to the proposals principally on the design and the lack of affordable housing. Whilst many may not wish to see the removal of two four bedroomed houses, in the current climate of requiring increased housing and redevelopment in the urban area, this type of application on a site such as this would be difficult to defend on appeal. Direct access to this type of site from the A24 would likely be strongly opposed by highways engineers; the fact that the site has an existing entrance from White Horse Drive will count in its favour. However, the external design as presented is far too boxy and bland and requires much improved architectural features. The viability statement has been studied by ECS members with experience in this field. It is considered that the projected construction costs are overstated

and thus artificially advancing the reasoning for no affordable housing being provided. The scheme should support the due proportion required by the current policies. Wholesale redevelopment along Dorking Road would not be welcomed and any approved development on this site should not set a precedent for the area as a whole.

The Lodge West Street Ewell (19/00801/FUL): Although this site may be outside our normal area, the Society was asked to comment on this application situated within Ewell Village Conservation Area and relates to the house and shortened rear garden being the former ground keepers' lodge of Gibraltar Recreation Ground. This application was for the demolition of the detached house and then construction of two houses and four flats on the remaining smaller size plot with the earlier approval remaining valid. The application was referred to the November Planning Committee for determination. The officer's report, whilst acknowledging there were shortcomings within the application judged by the standards of the local plan, recommended approval of the proposals based on the Council's lack of a five year land supply. The Committee challenged this and decided refusal: first, by reason of scale, massing, bulk and the fact that the detail would not enhance the character and appearance of the Ewell Village CA; second, that the development would not achieve public benefits that outweigh the harm and adverse impacts of the scheme when assessed against the NPPF, Planning policies DM 8, 9 & 10 and CS 5; and third, does not meet the car parking standards of DM 37 and CS 16 resulting in harm to the surrounding area in terms of street scene and availability of on-street car parking. In coming to this conclusion, which the Society strongly supports, the committee has shown that the current policies remain very relevant. In the light of many contentious applications in the pipeline, this decision highlights the importance of planning policies which cannot simply be set aside to achieve a very questionable Borough-wide desk based housing target.



Wells Community Centre, Epsom Common (19/00929/FUL): There have been over 400 letters of opposition to the proposal to demolish the Wells Community Centre and build 23 residences, including strong objection from the Society regarding poor design, height and density. As a Council-led scheme, there is a very strong case for a complete re-think on this one.

Michael Arthur

CONSERVATION AND HERITAGE

The last three months have been my busiest period ever on Conservation & Heritage. Many of our 21 Conservation Areas (CAs) could be affected by the recent tranche of controversial Planning Applications and the upcoming Local Plan. Many of these proposed projects are located in CAs, immediately adjacent to them or affect the beauty of these areas. Some of the high-rise schemes overlook the CAs and affect the privacy of these areas. At our recent meeting with the Council, Steven Lewis (Conservation Officer) said that they were working to reduce harm on the CAs impacted by the current proposals. Watch this space!

The ECS view is that our delightful CAs are under threat, or at least the victims of neglect (highlighted in our Chair's commentary), and that current proposals in the Masterplan (and current advice being given to developers) give insufficient weight to our heritage because this conflicts directly with the achievement of target numbers of new housing. Our local plan should specifically target maintaining Conservation Areas and historic buildings.

The current large developer schemes are 24-28 West Street, Woodcote Grove, The Wells Centre, The Old Police Station, Guild Living/L&G Epsom Hospital site and Stoneleigh Station Approach. We reported on many of these in our Autumn Newsletter.

24-28 West Street, Epsom Town Centre (19/01021/FUL): The application to demolish the historic Furniss building and construct a 13-story high-rise tower block is still under consideration. To date over 300 letters of objection have been lodged, including Historic England, with two in support! We initially objected to a 6-7 storey scheme mainly based on the demolition of the old Furniss building but always recognised that the height should not exceed the existing Station Approach blocks. This proposal was developed with the Council Planners to maximise the density and height thus achieving a design that conflicts with their own height policies and with the aims of the Town and West Hill CAs.

WS Atkins Grounds, Woodcote Grove (Reference 19/00999/FUL): This development, divided into two areas (a new eight-storey block of flats and new/refurbishment works to the listed Mansion House), has also drawn a strong public reaction with over 100 objection letters, including Historic England. The west part of the site would have a major impact on the Chalk Lane Conservation Area and the rural character of this delightful part of Epsom. As recently as 11 November Surrey Council Council (SCC) as Highways authority has been seeking more detailed information about the road/traffic implications from the applicant particularly the Worple Road and Chalk Lane access points and is not supportive of the potential extra strain on these roads which it says they have over past years being trying to minimise. SCC is also questioning the suitability of the connectivity of the site with cycling and walking to the town centre. We do not see this application quickly being resolved.



Former Police Station & Ambulance Station Sites, Church St: McCarthy and Stone has held consultation sessions with local residents concerning schemes for 7, 8, 10 and 12-storey high-rise blocks. We will be objecting to the heights and density of these proposals and the effect on the Church Street Conservation Area. We note that the Council has been refusing applications based on the effect on our Conservation Areas. We await the final proposal and planning application.

The Guild Living /Legal & General Epsom Hospital residential home: The developer has purchased the former nurses' home and hospital facilities at the rear of the main hospital site on Woodcote Green Road. The proposal is to build a 12 storey high rise block at the west of the area with lower blocks adjacent to Woodcote Green Road. ECS has attended the developer's presentation and has stated its initial concerns regarding the height, poor designs and whether we need another large care home in the town. We will be meeting with Guild Living in December. The proposed site is close to the Chalk Lane CA and the new tower block would dominate the Woodcote and Millennium Green pond area landscape. This project could well be the sorry start of running down Epsom Hospital in small packages and replacing with high rise private developments.

1 Higher Green proposed new house (19/00758/FUL): We are pleased to report that the application was refused. We objected based on our concerns regarding the effect on the CA and proximity to a school.

Other Matters

At our recent meeting with the Council Planners, we raised the matter of **enforcement**. On several recent schemes our members have requested our assistance on how they should complain when the ongoing construction is straying from the approved designs. Ruth Ormella (Head Of Planning) said that a) the Ombudsman's website has a guide re planning complaints and b) that it's advisable to use EEBC's online form for enforcement complaints rather than generally writing in. We also suggest that a photographic log is kept and any divergence from the approved plans are reported ASAP. If the complaints are left to the end of the construction, then a retrospective Planning Application can be made.

Other ongoing applications and proposals being reviewed are:

- Langley Vale Green Belt Land – New housing development on the Langley Bottom farm area.
- Headley Court – New houses (100) and retirement village (115 two-room dwellings). We attended a presentation to local residents. ECS is concerned by the impact of construction in this highly rural area and with single-lane multiple user roads.

Bob Hollis

TREES – Some Good News!

We have some good news in that the first new tree in the Market Place was planted on the 28th October and a total of 15 trees are now in situ. There are 7 Small Leaf Limes on the road side boundary and 8 Japanese Pagoda Trees on the inner avenue. There are 3 Red Maple trees still to be planted, making a total of 18 new trees in all. These semi-mature trees are already making their presence felt and will look spectacular from next Spring. Their canopy coverage will exceed that of the trees that were removed and I think the Borough can be justifiably proud of what has been achieved.



Mike Ford Epsom and Ewell Tree Advisory Board

THE DOWNS

Stephen Wallis has succeeded Nigel Whybrow as the Jockey Club Racecourses group director of international and racing relations and he is now the representative on the Conservators. Stephen was formerly a managing director of Epsom Racecourse.



A number of issues were discussed at the recent meeting of Conservators including how to resolve the longstanding issue of maintenance of the Sand Track on six-mile hill for horse-riders and raise awareness of the Downs and their usage by increased signage and notices. Approval was granted for events on the Downs, albeit Councillor Jan Mason felt the numbers had increased too much. Assurance was given via the Chair that numbers are well below those limited by the 1984 Act and also, after each event, any damage is assessed. Organisers have to deposit a re-instatement bond which is refunded if no damage occurs.



Much time was spent discussing an application by the Racecourse for permission to allow Barbecues (BBQs) on the Downs for three days a year – Ladies Day, Derby Day and August Bank Holiday race meetings. Attendance on the Hill has declined markedly and it is hoped that, if permitted, more

visitors would come. (The 1984 Act bans camping or the lighting of fires without permission from the Conservators). There would be two fenced enclosures on the Hill which would be stewarded. No disposable BBQs would be permitted as they could damage the turf if put on the ground. The use of disposable BBQs is not permitted in any public space within the Borough. Simon Durrant of Jockey Club Racecourses assured the meeting that flyers about safe use and disposal would be given to all those who entered the enclosures. Larger parties would have Health and Safety advice too. Sufficient fire-fighting ability would be maintained and stewards around at all times. While some Boroughs have withdrawn permission in public areas for reasons of litter and anti-social behaviour, and in some cases reduction in air quality, it is not anticipated these will be more problematical on the Downs on these limited, stewarded and policed Race meetings. The question of disposal was raised – visitors would have to take both BBQ and used and unused charcoal home with them. The vote was to give permission for one year (2020) and assess the result. Two Councillors opposed giving permission but were out-voted.

Angela Clifford

OBITUARY

John Hampton OBE FSA (20.5.1922 - 4.10.2019)

It is with sadness to report the death of John Hampton in October. We were very fortunate to have him on the Committee and as our Chairman (1989-1993). As chairman of the Society, John helped guide the Society's response to the large scale developments being undertaken in Epsom and other "developments" of historic importance and new buildings within the borough. We extend our sincere condolences to John's family and friends. A fuller tribute to John will appear in the next ECS Newsletter.



EVENTS

The Society will be holding an open meeting at 7.30pm on Tuesday 28 January at Epsom United Reformed Church, Church Street KT17 4PW about the Masterplan, Local Plan and government housing numbers. Please bring your friends and neighbours, we are keen to hear from them as well!

Save the Date: ECS Quiz Night at The Epsom Club - Saturday 20 June 2020!

Sheila Wadsworth

Membership:

If you are keen to join us, please contact: **Ishbel Kenward** - Membership Secretary (01372 728570) or email: membership@epsomcivicsociety.org.uk

Please send any letters or comments for consideration to: Newsletter Editor publicity@epsomcivicsociety.org.uk.

All of our newsletters are available in colour on our website: www.epsomcivicsociety.org.uk

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