

Epsom Civic Society Ideas and Proposals for an Alternative Approach to the Local Plan

The Masterplan as published sets out eight principles to shape the strategy for the Local Plan. The Society supports all these principles but is concerned that they are not actually followed through in the rest of the document, nor in proposals and 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.

The Society proposes an alternative approach below, focusing on sustainability and achievability, prioritising being “green” in all senses of the word, “of Epsom”, and valuing heritage and conservation, as well as physical, mental and social well-being above quantity, HMG housing policy notwithstanding. Topics are addressed roughly in priority order, most significant first.

We believe a very strong case can and should be made why the standard methodology proposed by HMG should not be applied in Epsom due to local exceptional circumstances, and indeed could not under any reasonable circumstances be achieved over the next 5 to 10 years in Epsom due to lack of available building land outside the Green Belt.

Building Height

The Society is particularly uncomfortable with the idea that a major increase in building height anywhere in the Borough is intrinsically “of Epsom”. The contrary is true, in that the predominance of two and three storey buildings is a key differentiating characteristic of Epsom, contrasting in particular with the boroughs to the north and east.

The tallest existing building in Epsom at present is, we believe, Hudson House with seven storeys, and this building was itself controversially approved over much protest from Epsom residents at the time. The significant volume of objections to the tall buildings currently under consideration would suggest that popular sentiment remains unchanged.

Further difficulties we have with the proposal to immediately and massively increase the height of Epsom buildings include:

- inappropriateness for a market town, which is what Epsom was historically and aspires to remain as distinct from an outer London suburb. (Epsom forms the boundary between rural Surrey to the South and 25 miles of London urban sprawl to the North, and residents continue to identify with the former rather than the latter);
- excessive discontinuity with existing Local Plan and policies – an increase of one or two storeys per decade might provide a smoother transition;
- a major health and well-being risk from both fire and mental/physical health perspectives, especially for elderly or infirm residents, who may need to be evacuated by wheelchair or stretcher;
- inappropriate infill development as individual plots become available: high density development should only be done on “whole areas”, and should invariably incorporate social or affordable housing, preferably the former, and include at least 20% of total area as green amenity space;
- fundamentally not sustainable in the context of the current “climate emergency” recognised by HMG, Surrey County Council and the Borough.

Design Quality – What is “of Epsom”?

In terms of materials and style, the residential parts of the Borough are surprisingly homogeneous, notwithstanding build dates spanning more than 100 years. More than 90% of the housing stock appears to be:

- one, two or three-storey detached, semi-detached or terraced houses
- built of brick or stone
- with a pitched roof of tile or slate
- with a different finish (brick, tile-hung, timber-clad, or just contrasting colour brick details) on the lower storey and at least part of the upper storey/s
- plentiful detail and/or contrasting materials/colours or outline to break up the lines of the basic structure
- green space and trees in streets and gardens.

The Society suggests this forms the basis of the definition of “of Epsom”, with the rider that the majority of our housing is currently “homes people would like to live in”.

Many residential streets have grass verges with street trees, increasing the space between opposite rows of housing and providing an open and green street scene.

That the existing urban area is 95% built-out in this vernacular style creates very considerable problems for planners faced with a relatively huge housing target. There is just nowhere to hide a high-rise building or claim that it is “of Epsom”.

Sustainability

It is proposed that the revised Local Plan should demonstrate that EEBC is committed to maximum action to recognise the global climate emergency, placing greater emphasis on addressing that than on meeting HMG’s artificial and CO2-generating housing number targets.

Development Management policies could include, for instance:

- conformity to Passivhaus standard for energy efficiency with state-of-the-art insulation, triple-glazed windows, and high-tech fans blowing fresh air in and stale air out.
- from Jan 2021 onwards, all new dwellings to incorporate non-fossil-fuel heating systems, solar panels and green roofs cover on all flat roofs. This in anticipation of the national prohibition on fossil fuel heating in new build from 2025.
- all new dwellings shall include within the curtilage Rapid Charging facilities for electric cars at the rate of at least one charging point per two parking spaces, except where new developments provide more than 25 dwellings, when a payment to facilitate public on-street rapid charging for one vehicle per 5 dwellings may be allowed in lieu.
- insulation at least 150% of current national minimum standards to be incorporated in all new buildings.
- at least 10 new deciduous trees of native varieties (plus as many as are removed to enable the development) to be planted in the Borough for each new dwelling to improve our net carbon footprint, new trees preferably being incorporated within the development site.

Such policies will enable the residents of Epsom and Ewell to be proud of their town for being at the forefront of climate emergency action and will continue to reflect the town's rural surroundings and keep the town green in both senses of the word.

Conservation

The Borough has a rich historical heritage and a number of Nationally Listed Buildings, as well as 21 Conservation Areas. They all form an integral part of the character and distinctiveness of Epsom, and need to be preserved for future generations.

It is essential that the revised Local Plan recognises the importance of Conservation Areas, and in particular of maintaining their street scene and housing density as well as the historical buildings and settings which most of them contain. These areas are as important to the character of Epsom and Ewell as the Green Belt which surrounds the southern part of the Borough.

The Society is concerned that current proposals in the Masterplan give insufficient weight to our heritage, presumably because it conflicts directly with the achievement of target numbers of new housing. We believe that this is yet another of those "exceptional circumstances" that mitigate towards a lower housing target. In addition, our plan would specifically target maintaining Conservation Areas and historic buildings, using CIL or other funding to support maintenance of heritage assets.

Well-being

To quote from the recently published Borough Health and Wellbeing Strategy, "Mental and emotional well-being is fundamental to our quality of life. Poor mental health has been found to impact on our physical health, on our interpersonal relationships and upon our performance in school, further education and employment."

Out of 11 boroughs in Surrey, Epsom ranks 4th for good mental and emotional well-being, and the Society believes that the quality and nature of our existing housing stock plays an important part in this ranking, particularly the low-rise, green space aspects of "of Epsom" design mentioned above. The Future 40 survey also showed that Epsom is valued as being relatively free from the anti-social behaviour and crime problems experienced by the more over-crowded London boroughs, which the creation of hot-spots of uniformly high-rise residential areas as proposed would risk importing into Epsom.

The Society's plan would target safety, crime reduction and welfare (mental and physical health) over quantity of dwellings: our housing focus should remain on improving the well-being of our community, ensuring that all new build is of homes that people would actually want to live in, rather than being forced to live in by economic circumstances, and should concentrate on social housing provision to prevent the growth of any local "underclass" given no stake in society by their economic circumstances.

Managed Transition

The Society agrees 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 in relatively small steps, 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 heights or density, we support 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." We also propose that this advice is extended to cover all the Borough's conservation areas.

In conclusion

The Society believes that our town was, is, and should continue to be more a market town than a London suburb, with heritage and green space to be cherished not discarded. Historically, our residents chose not to be part of Greater London, and the Society would suggest we should continue to resist all attempts to force us into the urban sprawl of London.

Our plan therefore should value quality over quantity, where quality can be defined as:

- maintaining the vernacular housing style as much as possible
- focusing on climate emergency, sustainability and achievable quantity
- maintaining the "look and feel" of Epsom as a Surrey market town, not a suburb of London
- conserving our heritage assets and conservation areas for future generations
- making new homes that support well-being and social cohesion
- avoiding sudden massive change in height or style of building anywhere in the Borough
- making change evolutionary rather than revolutionary
- improving quality of life for everyone.

Epsom Civic Society

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