

Epsom Civic Society

formerly Epsom Protection Society

shaping the future, safeguarding the past

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Viv Evans
Head of Planning
Epsom & Ewell Council
Town Hall
Epsom

12th January 2021

Dear Mr Evans,

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

Epsom Civic Society continues to object to this development at the corner of West Street and Station Approach.

We initially objected to the Outline Planning Proposal Ref 18/00940/OUT in October 2018. This proposal described a 5 storey building, with commerce/shopping at ground floor and 14 flats above, along with demolition of the Furniss building. We understand that this application is still pending consideration.

In September 2019, we objected to Planning Application 19/01021/FUL for a 13 storey residential block and ground floor commercial and retail units. However, we understand that there have been numerous objections from the local residents, Historic England as well as ECS. This has resulted in a significant revision of the scheme in November / December 2020, the major revision being the building height reduction from 13 to 7/8 storeys.

We are still very much concerned that the site is located within Area 2 of the extension to the Epsom Town Centre Conservation Area, and this part of the extension was specifically intended for its protection. The demolition of the Furniss building would



deprive this area of the sort of feature that gives Epsom its individuality. This CA appears on Historic England's risk register : Condition – poor, Trend – deteriorating. It is imperative that we do not allow this proposed development to cause additional harm.

We have previously stated that the proposed scheme would have a severe effect on the adjacent Stamford Green Conservation Area. The development completely conflicts with what our Conservation Areas stand for and promote. In recent years the Council have refused applications that have compromised the preservation or enhancement of a Conservation Area, which have recently (30th December 2020) been supported by the Planning Inspectorate for the Church Street CA, also within Town Ward. We consider that the existing properties contribute positively to the character and appearance of this conservation area. The new proposal fails to preserve or enhance the Town Centre Conservation Area. There would be a conflict with Policy CS5 of the Core Strategy (2007) and Policies DM5, DM8, DM9 and DM10 of the Development Management Policies Document (2015) (DMPD)

The obvious problem is still the sheer bulk, scale, design and height of the proposed building. This would adversely impact and harm the character and appearance of the area. Albeit, that the proposal has been reduced in height, it still presents a 7/8 storey mass at the West Street and Station Approach junction. When viewed on the Visual Effect drawings it is completely unacceptable, especially being viewed from West Hill. When approaching Epsom town centre from the west, you proceed from a sylvan landscape to a brickwork mass. The surrounding buildings are in the order of 3 storeys, with the buildings closer to the railway station at 5/6 storeys. We are concerned that this design does not comply Policy CS5 of the Core Strategy (2007), Policies DM9, DM10 and DM11 of the DMPD.

The building will cast a shadow over the residential units to the west of the site during the early part of the day. This will affect the privacy of the residents in Marshalls Close, Horsley Close, Sharon Close, and West Hill. All of these, except Horsley Close, being located in the Stamford Green Conservation Area.

We again note that this latest proposal does not include any car parking spaces. Although we support a sustainable transport approach we are concerned that it is likely that the new tenants would own cars and park in the surrounding roads. We understand from the briefing document that there is the provision for 30 cycle spaces. Although this complies with Surrey Vehicular and Cycle parking guidance, we question whether the cycle provisions are adequate when there are no car spaces. Additionally, there is no mention of any charging points for electric cycles.



The current scheme does not demonstrate how it will meet the Council's Climate Change Action Plan, Theme 1, Year one Item 5 "Actively seek opportunities to develop the borough's carbon neutral homes". Also, the Developer does not demonstrate how this building will meet Surrey's Climate Change strategy objectives.

The Developer does not adequately address the Council's Sustainable Design and Planning Document CS6. This states that "The council will expect proposals to demonstrate how sustainable construction and design can be incorporated to improve the energy efficiency of the development". The following information is lacking, namely minimising the energy requirements of construction, waste management, air quality/noise/light pollution, and water management.

While we remain opposed to the entire scheme, the following points of concern require particular attention in the event of a preference to approve it. Many of our members are extremely concerned about the construction process. This is mainly due to the restricted site access, heavy local traffic, local schools' access, contractors parking and environmental problems. Several local projects have had to be halted due to the lack of an agreed Construction Management Plan. These issues need to be satisfactorily resolved before any permission is granted. This particular site presents unique challenges for any construction, let alone a high 7/8 storey block which virtually fills the whole site, given the location, traffic density and the presence of a high railway embankment and bridge adjacent to the property.

The latest proposal has made major changes to the elevations. We note that the west facing balconies have now been omitted. This reduces privacy problems to the properties on the west side of the railway. The new green wall is a welcome feature. However, in order for it to be 'living', suitable maintenance and irrigation measures, as yet unspecified, must be provided and be enforceable.

We are concerned at the design layout of the angled roof. Its positioning does not offer shading during the summer months when the sun is high. It is likely that the flats on this elevation would suffer from excess heat possibly requiring the need for air conditioning. We suggest that the roof design is reconsidered prior to any approval being given, so as to offer shading to the balconies and possibly give the opportunity for the use of solar panels or solar hot water systems.

At present we do not consider that a Sustainable Design has been achieved. There is minimal evidence that BREEAM targets have been met. We suggest that a more sustainable design could be possible by the incorporation of several design aspects eg concrete frame, energy piles.



None of the Planning Applications have addressed the issues in working alongside the railway. Network Rail would need to approve the design of the building so that it does not endanger its assets or pose a threat to the travelling public. Also, there are very stringent rules relating to the construction process eg. tower crane trespass, scaffold designs and working practices. None of these are mentioned in the briefing. On the adjacent Epsom Station site, we understand that there were severe delays due to the lack of awareness of the Network Rail procedures and this contributed to an extended construction period.

Upon review of the NPPF (para 196) we are concerned that the public benefits do not outweigh the harm to this designated area. The public benefit is limited due to the lack of affordability, housing mix, adverse visual impact, un-neighbourliness through overlooking and visual obtrusion. Therefore, the harm does outweigh the benefits.

In conclusion Epsom Civic Society objects in the strongest terms to this latest application. In our view, this proposal damages the nature of Epsom's character, heritage and conservation areas. The Town Centre Conservation Area is an asset to the town. Shaping the future is a challenge. This 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
Bob Hollis, Epsom Civic Society



