

## *Shaping the future, safeguarding the past*

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Justin Turvey BA(Hons), DIPTP, MRTP  
Interim Head Of Place Development  
Epsom & Ewell Borough Council  
Town Hall, Epsom

16<sup>th</sup> January 2024

Dear Justin,

**Ref- Friars Garth 23/01451/FUL - Additional 4<sup>th</sup> Storey to accommodate 3  
Flats to previously approved planning application 21/00701/FUL dated 14.02.2022**

### **OBJECTION**

Epsom Civic Society thanks you for your letter of the 3<sup>rd</sup> January 2024 informing us that a new planning application (23/01451/FUL) had been received in respect of a latest proposal for altering the previously approved planning permission 21/00701/FUL.

ECS have recently visited the site and confirm that construction works have halted at the 3<sup>rd</sup> Floor ie approximately mid-way on the overall project. The current proposal is to demolish the part built between top of 2<sup>nd</sup> floor to mansard roof and replace with a new full 3<sup>rd</sup> Floor.

ECS strongly suggests that the latest planning application should relate to the whole development (12 new flats, 4 storey height) and not to just the additional floor. Therefore, we have to OBJECT to the 23/01451/FUL application. There are many considerations and concerns that apply to a 4 storey building in this key location. These may have been reviewed at the time of the previous approval in February 2022 and should now be reconsidered. We do not think that this application is an amendment to the existing permission as it suggests that the new building has been completed and in occupation.

There have been updates to National and Council policy since the granting of the approval to the current, and now halted, development. This application sets a new and different dimension to the development of this site. Epsom has a new Town Centre Masterplan, which

has been published and consulted. This plan suggests that buildings up to 4 storeys would be suitable and shows new flats on the north side of The Parade being built to that height. The existing buildings on the south side of The Parade include both 3 and 4 storey heights and high-level mansards. ECS are not objecting to the proposed height of the new development. NPPF 124e supports the opportunity to use airspace for new residential above existing residential. ECS suggests that the site is mid-way constructed and not an existing residential block.

This application should relate to a development for 12 flats and therefore changes from a minor to a major scheme. This now triggers the requirement for affordable housing. Other considerations should now include additional amenity space, overlooking of neighbours, loss of privacy, overshadowing and car parking spaces. This latest proposal does not provide the additional car parking to adhere to Epsom's requirements ie 0.75 spaces per flat. Council Policies include review of DM11 (Density) and DM12 (Amenity Space).

There are also several technical points to be taken into consideration. These include, foundation designs, drainage volumes and discharge, fire escapes, firefighting and community lobby layouts. Likewise, the high-level demolition works could affect structural designs and connections.

We have considered the proposed works in relationship to the new Town Centre Master Plan. The Parade would become busier with an increase in traffic and pedestrian movement. The existing footpath to the south side of The Parade stops short at the Friars Garth site boundary. ECS believe that there is a case for a sec.278 agreement to provide for a new footpath at the front of the site. This is an example of new factors that should be considered relating to a 4 storey development at Friars Garth.

In conclusion, Epsom Civic Society objects to this application as it should relate to a new 4 storey, 12 flat scheme and not to a 'half built' ongoing project. Also, we believe that there are new factors which come into play which need to be recognised.

Epsom Civic Society recommend that this application is refused.

Yours Faithfully,

Bob Hollis

(Vice Chair ECS)