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

25th March 2024

Dear Justin,

Ref- Friars Garth 23/01451/FUL – Alterations to building a four-storey flat building with an additional storey to accommodate 3 Flats. Altering the previously approved planning application 21/00701/FUL dated 14.02.2022

OBJECTION

Epsom Civic Society thanks you for your letter of the 13th March 2024 informing us that amended plans had been received for the overall development and not just for the additional 4th storey.

Epsom Civic Society also thanks you for your letter of the 3rd 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 3rd Floor ie. approximately mid-way on the overall project. The current proposal is to demolish the part built between the top of 2nd floor to mansard roof and replace with a new full 3rd Floor.

We understand that the latest amendment describes the provision of 12 residential flats and therefore changes from a minor to a major scheme. These being 8 x 2 bedrooms + 4 x 3 bedrooms, however none of the flats are designated as being 'Affordable'. We have studied the applicants Financial Viability Appraisal and suggest that there are insufficient grounds to

obviate the requirement for affordable dwellings. It is also noted that the composition of the proposed flats differs from the approved scheme eg. where is the 1 bedroom flat?.

Other new considerations should 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 i.e.75 spaces per flat. Council Policies include review of DM11 (Density) and DM12 (Amenity Space).

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.

There are also several technical points to be taken into consideration. These include, foundation designs, drainage volumes and discharge, fire escapes, firefighting, services risers and community lobby layouts. Likewise, the high-level demolition works could affect structural designs and connections. There is also the question of who takes responsibility for the works already constructed inc. drainage?

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 4storey development at Friars Garth.

ECS understands that there are Conditions relating to the approved planning application 21/00701/FUL. These conditions should remain in force for the latest application, however there are several areas of concern in the practical implementation of the conditions eg Condition 9 verification report on the satisfactory construction of the surface water drainage. It would be challenge for a new builder to be responsible for any 'mistakes' by the previous company. We suggest that such matters are identified and reviewed prior to any new approval.

In conclusion, Epsom Civic Society objects to this application. We suggest affordable dwellings should have been provided on this latest application. Also, there are new factors which come into play when considering a four storey block in comparison with the previous three storey building.

Epsom Civic Society recommend that this application is refused.

Yours Faithfully,

Bob Hollis

(Vice Chair ECS)