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By email

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Epsom Civic Society's OBJECTION response to 24/01107/FUL (Hybrid Planning application for the phased redevelopment of the Former Gas Holder Station site at East St, Epsom).

Epsom Civic Society warmly welcomes the redevelopment of this key site within Epsom Town Centre. It has lain dormant for far too long and offers a significant opportunity for transformation into a residential led mixed use scheme that can make a major contribution towards meeting the Borough's outstanding housing needs, support the enhancement of Laine Theatre Arts and assist in revitalising Epsom town centre.

However, the Society cannot support this application as it stands for the reasons set out below.

The Town Centre Masterplan (TCMP) lists 3 options for the Hook Road and SGN opportunity site. Option 1 is preferred as it incorporates a maximum land area to achieve a higher quantum of residential units being a more co-ordinated and appropriate planned approach for all of the site that was formerly gas works operational land including workers onsite cottages. Options 2 and 3 exclude parts of the whole of option 1, which when taken

separately are less satisfactory from a town planning perspective and certainly sub-optimal than using Option 1.

24/01107/FUL application is for the least area of land being option 3 of TCMP. We endorse the comment in the Masterplan (relative to option 3) *“partial development resulting in a decrease of residential units would undermine the chance to create a vibrant and attractive quarter for the Town Centre and would be much reduced by the omission of the multi storey car park and Majestic Wine Warehouse and drive capacity nearer 400 units.”*

The Society clearly recognises that it must comment on the application before it and that is what the Planning Committee are being asked to determine. Nevertheless, it would be remiss of the Society not to underline the fact that as presented this application will inevitably fail to optimise the development potential of the whole opportunity site and that it presents unnecessary problems through the juxtaposition of existing and proposed other uses.

In essence the Society considers that the application proposals are too intensive, massive and crammed for the site area. The heights of all blocks are too high. The Masterplan states ‘building heights up to 7 storeys, with further height to be justified’. ECS does not consider that the submitted Design and Access Statement nor the Heritage, Townscape and Visual Impact Assessment demonstrate that the proposed 8, 9, 11 and 12 storey blocks would not be harmful to their surrounding context. Indeed, the views analysis merely underlines the reservations set out in the Masterplan about a tall tower ‘appearing incongruous with the prevailing character of this part of the town centre, and particularly prominent in and stark in views from and including sensitive visual and heritage receptors.’ ECS believes that the 11 and 12-storey dodecagon towers in particular, would not be well related to their context due to the height and massing of these buildings and this would result in significant harm to the character and appearance of the area. This would also be the case with the 8 storey Block E and 9 storey Block G owing to their additional massing and proximity to surrounding residential properties.

The Society’s reservations about the acceptability of this scale of development is considered to be clearly demonstrated in the views included in Heritage, Townscape and Visual Impact Assessment from various places external and into the site, notably from Middle Lane, Lintons Lane, Victoria Place, Adelphi Road, Chase Road, Hook Road, Miles Road, Church Street from its junction with Upper High Street and High Street. The proposed buildings would not relate well in terms of height and massing and cause significant harm contrary to the NPPF and Local Plan policies.

The Society also has significant concerns about the proximity of Block C to the proposed "Yellow Box" site (former Majestic Wine Warehouse). This results in a serious outlook and daylight effect on the lower four storeys of Block C being overshadowed by the "Yellow Box". This is clearly demonstrated by document ‘Site-section C-C Proposed’. The submitted ‘Spatial Daylight Analysis’ also demonstrates that rooms on the lower ground floors on the western elevation of Block C would have light levels of, for example, 48 Lux in a living room when recommended levels are 200 Lux or 7 Lux in a bedroom when recommended levels are 100 Lux. Whilst guidance suggests that daylight indicators should be used and

interpreted flexibly within urban areas we would suggest that this shortfall from recommended minimum standards merely serves to demonstrate the substance of our objection that the site layout is not acceptable regarding Block C and not conducive to acceptable living conditions for its occupants.

There is also a consequence of Block C in its proposed siting adversely affecting and constraining the residential redevelopment potential of the adjoining site of Newplan House and car park, as highlighted in the objection lodged on behalf of that site's owners Trustees of the Stagecoach Pension Fund.

In Summary

- The scheme as presented is too high, too dense and cramped for the size of the site being not well related to the adjoining residential areas which include the Adelphi Road and Lintons Lane Conservation Areas.
- The particular disadvantages about Block C and its siting.
- Views into the site from various public spaces around the town will be of significant harm and incongruous.
- External amenity space is inadequate for the quantum of development and the housing mix which includes family units
- The larger (and formerly original) Gas works site (Option 1) would be better redeveloped as a whole rather than piecemeal as with this application.
- The application is not acceptable as it stands.

Sincerely,

Margaret Hollins

Chair of the Committee

Epsom Civic Society

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