

# Epsom Civic Society

formerly Epsom Protection Society

shaping the future, safeguarding the past

[www.epsomcivicsociety.org.uk/](http://www.epsomcivicsociety.org.uk/) | email: [chairman@epsomcivicsociety.org.uk](mailto:chairman@epsomcivicsociety.org.uk)

Facebook: EpsomCivicSociety | Twitter: @EpsomCivicSoc

Place Development Service  
Epsom & Ewell Council  
Town Hall  
Epsom

Att. John Robinson

7<sup>th</sup> October 2020

Dear Sir,

## **Ref: Planning Application 20/01229/FUL Friars Garth – OBJECTION**

The Epsom Civic Society strongly object to this proposal for the demolition of Friars Garth and the construction of 18 flats above ground floor commercial areas.

The Architect's design is one of the poorest that we have seen in recent years, showing zero ambition and bringing few aspects of high quality contemporary design. The building façade elevations are reminiscent of a 1990's office building! This high density scheme has been developed to optimise the site's redevelopment potential whilst completely ignoring the many relevant current local planning policies.

The NPPF's National Design Guide states in the Introduction that "The long-standing, fundamental principles for good design are that it is: fit for purpose; durable; and brings delight. It is relatively straightforward to define and assess these qualities for a building. We can identify its activities and users, the quality of detail, materials, construction and its potential flexibility."

Also, within the Design Guide it states that "developments should clearly take account of local vernacular, architecture and materials." These flats are designated as affordable but why should the occupants not benefit from good design? It is very difficult to see what 'delight' would be brought to these occupants.



Furthermore, the application does not respect the attributes required for the National Design Guide. This guide is given weight in the White paper “Planning for the Future (Aug 2020) para 3.3 page 38 ... “The potential has fallen short. Too many places built in recent decades fail to respect what is special about their local area or create a high quality environment of which local people can be proud”

We list below the main design problems :-

- No balconies
- Poor external natural lighting to inner areas
- No solar shading
- No washing / drying areas
- No external gardens or play areas
- Flat Roof design
- No Disabled Access
- No drop off / delivery parking for postal deliveries, food deliveries, maintenance

Nye Saunders Architects are a well respected and award winning practice with many excellent schemes in this area. What has gone wrong on this proposal? We suggest that the visual aspects of this scheme are completely reviewed and re submitted. The ECS support the local need for more affordable housing but this proposal does not appear to provide for the basic needs of the occupants. It is in our view clearly contrary to many of the fundamental design requirements set out in paragraph 127 of the NPPF as well as Local Policies **DM9** and **DM10**.

**DM12 (Housing Standards)** have not been achieved due to the garden/amenity areas not having at least 2 hours of sunlight in a day. This makes these minimal external areas unusable for amenity space nor for children play areas.

We note that these small flats have no allowances for disabled persons. This includes the lift lobby, corridors and general circulation areas.

Upon review of the scheme we cannot identify any environmentally friendly designs ie solar heating, renewable energy, light sources, rainwater collection points. It appears that the designers have ignored all the latest environmental design ideas achieved in the last 20 years.

The designs and layouts of the ground floor offices show no reference to lessons learnt from the coronavirus. Maybe the layouts predate Covid and need to be revised.



The proposed design for Friars Garth does not blend in well with the setting of the east end of The Parade. Although the face brickwork works well, the Rieder concrete cladding panels do not mirror any of the adjacent buildings. They would appear ‘stark’ when comparing the adjacent facades. This new street scene would be unacceptable.

The site is adjacent or closeby to several listed buildings including The Old Pines at 2 The Parade. The proposed designs for Friars Garth do not complement any of these properties.

We note that the building layout maximises the dimensions of the plot. This leads to a major loss of the existing landscape areas and presents a completely different outlook to the neighbours ie The Cressinghams. The proposed height of the rear building extends above The Cressinghams and will cause privacy problem for the lower units.

We believe the plot size is compromised and the application is premature in that it fails to incorporate a small plot of undeveloped vacant land adjoining to the Northwest. A redesigned and improved scheme which added this land would present a better and less piecemeal planning proposition.

The scheme accordingly fails to comply with the requirements of Policies **DM9** (Townscape Character and Local Distinctiveness) and **DM10** (Design Requirements for New Developments)

We are also concerned with the loss of trees and landscaping. Policy **DM 5** requires the trees and landscaping to be protected and enhanced and Policy **DM 16** presumes against the loss of rear gardens to maintain local character, amenity space and biodiversity. This is certainly not the case at Friars Garth. The existing garden is lost and only a minimal grass boundary is proposed for the premises. The Category B Locust Tree is lost and not replaced due to the new building layout coverage. This central area of Epsom still maintains a good depth of green landscaping. This is provided by the Conservations Areas (Church Street and Town), nearby parks, tree lined streets and the residential gardens. Such schemes as Friars Garth blight this visage and could set a precedent for other central Epsom residences to be demolished and replaced with full plot new constructions. We would like to see more done to replace and enhance the green infrastructure on this site.

Car parking provisions and secure cycle storage have not been adequately considered. The ECS have reviewed some of the other social housing schemes in the Borough eg Longmead area and note that they all have a single car space plus secure sheltered cycle storage. The occupants then park work vans and possibly a second car in nearby roads.



Epsom's current car parking policy is that there is 0.75 space required for every 1-2 bed units ie 13 spaces total. Whilst appreciating that the NPPF could be changing this to nil spaces, there will still be the challenge of occupant work vans. These may well occupy the CPZ spaces in The Parade out of hours. The current CPZ timings may need to be adjusted to stop this happening.

The office area tenants will also require car parking and cycle storage. The Developers Transport Statement suggests that there will be the need for 10 car users and 4 cyclists. No provisions are shown on the plan and the Statement suggests that they can park opposite in The Town Hall car park. This only has 8 spaces of which some are allocated for the disabled !

The current SCC policy requires secure cycle parking at 1 space per unit ie 18 at Friars Garth. This number has not been provided and therefore requires amendment.

We note that there is not a clearly defined provision for recycling waste bins for the flats nor for the offices. Also, it is unclear on how the council's waste operatives will safely access the side entrance. Again, this key environmental issue has not been fully reviewed and included within the scheme.

The ECS understand that no provisions have been made for green roofs. The designers state that they have currently discounted them due to the lack of detail requirements for any future roof plant. Usually at this stage of the overall design ie RIBA (2020) between Stage 2 Concept and Stage 3 Spatial Co-ordination, such key items as roof plant would have been considered. We are again concerned that key environmental designs are not being included. There are opportunities for a green roof treatment on the link area between the front and rear blocks.

We have considered the use of sustainable materials within this design. The 'modern look' of the Rieder concrete panels, which include a glass fibre reinforcement do not meet this specification, other materials may be better suited.

This development does not meet The Council's Climate Change Action Plan Theme 1 objective 5 which states "Actively seek opportunities to develop the borough's carbon neutral homes".

We also consider that **DM4 (Biodiversity & New Development)** has not been met. Bats have been observed on the site. Their roosts would be lost when the garden is replaced with a full site area building. Reference is made in The Ecological Assessment report to avoid bat disturbance from artificial lights. It is hard to see how such measures could be



achieved and how mitigation to safeguard the conservation of the bats' on the site could be met.

In conclusion, The ECS object in the strongest terms to this poorly designed and poorly conceived proposal. Many of the current Council Policies as set out above, have not been achieved and the proposal gives scant regard to environmental considerations and user requirements. This proposed site immediately faces the main Town Hall entrance thus giving all visitors a poor impression of what 'Good Design' in Epsom is acceptable. The proposal demonstrates a total lack of understanding of the local character and sylvan nature and street scene of The Parade. It consequently fails to provide either an attractive and distinctive building nor one that would enhance its surroundings.

The Society requests that this application is refused in its present form, or withdrawn by the applicant for a complete re-appraisal.

Yours Faithfully  
The Epsom Civic Society (Bob Hollis)

