

Epsom Civic Society

formerly Epsom Protection Society

shaping the future, safeguarding the past

www.epsomcivicsociety.org.uk/ | email: chair@epsomcivicsociety.org.uk

Facebook: EpsomCivicSociety | Twitter: @EpsomCivicSoc

To: All Councillors
Epsom and Ewell Borough Council

19 April 2021

By Email

Dear Councillors,

Planning in the Borough

I am prompted to write to you as Epsom Civic Society Chair in anticipation of two major planning applications coming before the Council's Planning Committee this spring, relating to redevelopment of the former hospital site by Guild Living (Ref 21/00252/FUL) and the demolition and redevelopment of 24/28 West Street (Ref 19/01021/FUL). While these applications represent a significant watershed for the Borough in terms of identifying what the Council considers **acceptable building heights** for new development, the origins of the Society's fundamental concerns are of longer gestation and relate more broadly to the Borough's Planning future. In consequence of these applications, and in the interests of the Society's members (almost 1,800), I am mandated by the Society's committee to set out here our concerns about the **state of Planning in the Borough**, and the current limitations on its ability to deliver a future that meets the aspirations of our communities.

These Applications

1. The Society's detailed objections to these two applications have been submitted via the usual channels and are available also on our website. Here we would draw to your attention to the **revised Guild Living proposal** remaining much higher than the hospital's Wells Wing, presenting an **unacceptable physical intrusion in terms of height and mass**. We regret to note that the Report to Committee as published is, in our view, less than robust and balanced in its professional analysis and recommendations.
2. Our incredulity at the lack of sensitivity of the proposed replacement building for **24-28 West Street in the Town Centre Conservation Area** described in Historic England's risk register as 'poor' and 'deteriorating' is undiminished by the reduction of the originally proposed 13 storeys to 8. Overlooking the adjacent Stamford Green Conservation Area, the sheer **bulk, scale, design and height** of the proposed building would **adversely impact and harm the**



character and appearance of both Conservation Areas quite apart from the loss of the Furniss building, itself a locally valued though unlisted heritage feature. There are ways to improve the Borough without having to 'glass-tower the town into modernity'.

3. The applications have generated a high number of objections. In the case of the Guild Living application: objections 468, in support: 3; for 24-28 West Street: objections 543, in support: 4, yet objections appear to carry little weight, with the associated inference that community voices are effectively being ignored.
4. The Society hears from its members and from non-members alike, time and time again, that their desire to **resist the proliferation of tall buildings in the Borough and prevent the consequent erosion of local character and distinctiveness is being ignored**. The negative impacts of these two applications, if approved, would open the floodgates to more of the same which could be difficult to resist.
5. **It is the Society's view that these applications are symptomatic of insensitivity to context and indicative of a lack of vision and a lack of commitment to well-planned places on the part of the Council and our elected representatives and that if approved, will be deeply unpopular and compromise the ability of the Council to deliver a new Local Plan that has cross-community support.**

How have we got here: the paralysis of local planning

6. For several years, the Borough has been operating in what may be termed a 'planning vacuum', experiencing a **fundamental disconnect** between central government requirements and what is reasonably deliverable locally in Planning terms.
7. The paralysis of local planning is due in part to centrally imposed changes in relation to national policy and guidance and to anticipated legislative change delaying adoption of a new Local Plan. Austerity policies leading to cuts in local government resourcing have not helped and the pandemic is a late entrant as an influential factor.
8. Local lack of postholder continuity through short term contracts, with associated loss of local knowledge and consequent impact on overall resilience of EEBC's Planning team has also impeded progress at a critical time, particularly in connection with making progress with a new Local Plan.
9. **Excessive focus on housing numbers** at the expense of other material considerations, and an apparent disregard of the (still relevant) height policies in the current Local Plan in favour of an informal policy change of dubious validity by the Licensing and Planning Policy Committee in May 2018 has resulted in confusion, mixed messaging and the Society would suggest, inappropriate encouragement to developers to build higher and higher.

10. Approved schemes frequently make **no meaningful contribution towards priority housing needs** regarding housing mix and tenure, another **fundamental disconnect** which needs addressing.
11. It is difficult to escape the conclusion that what has led us to this point is an excessive, albeit understandable emphasis on housing numbers together with an unwarranted downgrading of other material planning considerations and a misplaced desire among the Planning team's former leadership to transform Epsom into a generic high-rise town rather than enable its transition into a modern market town where heritage and character are valued not only for their history but for their contribution to future prosperity.

Unacceptable Consequences

12. That Planning has failed to progress in the Borough in terms of strategic coherence and policy consistency embodied in a newly adopted, NPPF compliant Local Plan leaves the Borough vulnerable to what local communities and neighbourhoods regard as inappropriate development, especially in terms of **building heights** but also in terms of social housing provision.
13. Until a new Local Plan is adopted, we cannot know how policies in the new Plan will operate to reduce the starting point of 577 dwellings a year by accounting for the impact of local constraints and consequently identifying a realistic housing figure for the Borough.
14. **To commit to approving controversial planning applications with the potential for significant long-term adverse impacts on townscape and that fail to meet priority housing need, as here, is in the Society's view not compliant with current local policies nor with central government objectives.**

Community Voices: Council at Risk

15. Through our newsletters and open meetings, the Society has commented and raised awareness for over four years on the Local Plan review, housing numbers, land supply, acute development pressures and the prospect of massive transformational change facing the Borough. In meetings with relevant stakeholders, we have sought to represent community concerns, including those concerning building heights and lack of affordable / social housing.
16. The Society welcomed the Council's agreement following a public petition in November 2019 to endorse **6 key principles** that would 'form the backbone of the Council's new Local Plan'. The danger now is of the Council **compromising these principles** (especially relating to the character of the Borough, design, building heights and density) **by approving these planning applications.**
17. **Decisions inconsistent with the 6 principles would renege on that endorsement from the Council, jettison the petition in unacceptable disregard of the community voices Council**

Members are elected to represent and would undermine delivery of the Council's own future policy and vision for the Borough in any new Local Plan.

18. It is difficult to give credence to a 'Local Plan -shaped by you' – when we are faced with the prospect of approving developments as unpopular as these. The community's resulting loss of trust and confidence in their elected representatives is no doubt something that Members would wish to avoid.

Building Back Better and Beautifully

19. Central government in its planning reform agenda recognises the **importance of good placemaking, local distinctiveness and quality of design**, evidenced most recently by its consultation on the National Model Design Code which sets out helpful parameters regarding density and building heights which are considerably less than presented in the Guild Living and 24-28 West Street schemes.
20. Sound planning decisions are **not about housing numbers alone** as evidenced by Secretary of State Robert Jenrick's written Ministerial Statement to Parliament last December.
21. It's not all about increasing height either, as the new London Plan acknowledges with a **much-reduced height default threshold definition for tall buildings** reduced from 25m in height in the Thames Policy Area and 30m in height elsewhere in London, **to 6 storeys or 18 metres** across the entire Greater London area, reportedly in response to calls from some outer London boroughs for an approach more sensitive to local context. While the London Plan does not apply to Epsom and Ewell it does provide **strong persuasive arguments to resist unacceptably tall buildings here**, in a low-rise borough just beyond the limits of outer London, where no tradition of 'building tall' exists.
22. The apparent failure to rigorously negotiate with applicants and the absence of external design review have resulted in very poor-quality schemes being presented for approval.
23. **The Society calls on Members to ensure robust negotiation with developers on prospective schemes to achieve mutually satisfactory outcomes for developers and local communities, consistent with existing Local Plan height policies, the 6 key principles and associated visions for Epsom, pending the adoption of new planning policies in a new Local Plan.**
24. We welcome and value the willingness on the part of the Head of Planning and the respective Chairs of the Planning Committee and the Licensing and Planning Policy Committee to engage in discussions with us.
25. We have also had helpful and informative meetings with our MP, Chris Grayling on planning for Epsom's future.
26. We acknowledge the thoroughness with which members of the Planning Committee perform their duties, especially under current difficulties.

27. We know that our concerns about unacceptably tall buildings are shared by local residents, their associations and societies, pressure groups and a local Neighbourhood Forum and that **they are watching the outcome of these applications with interest and apprehension.**
28. We all have a shared interest in finding workable solutions that enable the Borough to deliver reasonable numbers of well-designed new homes (that deliver on local priority housing need), protect heritage assets, enhance local character, and improve communities' health, well-being and quality of life overall with well-planned places.
29. The Society supports building up to a six- storey maximum where contextually appropriate, careful strategic planning for the Green Belt, protection of local distinctiveness, adoption of new solutions for a thriving high street and sustainable communities, and homes that meet Future Homes Standards and are compatible with Net Zero targets.
30. **We respectfully submit that neither of these planning applications has sufficient features to meet these criteria in any meaningful way, and instead run counter to them in several respects.**

In conclusion, the Society seeks support from Council Members for a strengthened community voice to determine what we want Epsom to look like in 20 years' time, how we want it to function, and what we want it to embody in terms of being a model of good place-making and the home of diverse and resilient communities, where social and environmental value is not demoted in interests of pursuing a market utopia. Approving these proposed developments is not the way forward. Please avoid undermining your own future policy and vision for the Borough.

Yours sincerely,

Margaret Hollins

Chair, Epsom Civic Society

Cc Chris Grayling, MP, Kathryn Beldon, Chief Executive EEBC, Viv Evans Head of Planning EEBC, John Cheston, Planning Policy Manager EEBC, Mehdi Rezaie, Development Management Manager EEBC, Keith Tutton (SANF Chair), David Triggs, Richard Baker, Natalie Rogers (SCORA) Sue Hibbs (SSTBAG)

