

12 January 2010

Mr Mark Berry BA(Hons) MRTPI DMS
Head of Planning
Town Hall
EPSOM

Dear Mr Berry

PLANNING APPLICATION 09/00824/FUL
EPSOM STATION, STATION APPROACH, EPSOM
REDEVELOPMENT BY SOLUM REGENERATION LP

The station and the adjoining area have been in need of major improvement for many years and there have been numerous failed attempts. Our own files go back to 1986! The latest was Parkridge Estates whose application was approved in January 2005 subject the completion of a section 106 agreement. This has not happened and that partnership with Network Rail failed. We understand that the present scheme has evolved from the Parkridge design with a number of amendments and "improvements". It is most interesting to note the stages in the evolution as described in the Design Statement. We realise that the previous approval has a certain relevance to the consideration of the present application, but we consider it essential to judge the current proposals on their own merits.

We are informed by Solum that the extent of the development is required to provide enough capital to pay for the station, estimated to cost £4.5M, which Network Rail cannot find from their own capital.. We think that in principle a proposal cannot be justified on the grounds that it enables another development to take place, however desirable that may be, and again the proposals must be judged on their own merits.

Our comments will be related to the individual aspects of the scheme:

Height

This is a prime issue and is giving rise to much comment. We have heard reference made to the desirability of turning Station Approach into a Boulevard but we feel this description, which can be defined as a wide highway lined with trees, is misleading and a distraction from the proposed reality. This would be a busy road lined with high buildings which has been described, as quoted in Solum's Statement of Community Involvement, as a Grand Canyon or a wind tunnel. We consider that a building matching the height of Hudson House would not be an acceptable or desirable feature. The impression to visitors using the station, already confronted by Hudson House opposite, would be of a new high rise area,

the character of the old town to be discovered only on reaching the High Street. Epsom is, in our view, too small for such a split character to be successful and we think the result would be unfortunate.

The height of the building is also a vital feature for people living north of the railway and who are very concerned that the building would cause loss of light and privacy. The Design Statement makes a case for this effect being minimal. This may be possible where shown by the West Elevation on drawing T20E002 but not on the East elevation where the structure is not shielded by the station roofs. It is important that this is thoroughly checked and in our view the northern side of the building should be stepped down.

Massing

A major departure from the Parkridge design is the bringing forward of the building line to within a short distance of the back edge of the public highway. This increases the building area, clearly to Solum's advantage, but also increases the massing and removes the service road, the dropping off area and the taxi stand. The point we make here is that the massing is increased to an undesirable extent which affects not only the overall appearance but also the adverse effect on the area to the north.

Design and visual impact

This is the second main issue. It is, of course, subjective and is closely related to the question of height. We were impressed by the attitude of Solum's architect at a presentation he gave, and his design goes some way towards breaking up the elevation. It seems to be better than the Partridge scheme and considerably better than Hudson House. However, the most careful articulation cannot disguise a large 5-6 storey slab, and we are far from being convinced that such a building would be as desirable an addition to Epsom Town Centre as is claimed. .

Regarding materials, we like the suggestion of brick and glass but colour is of great importance, as became obvious with Hudson House, and careful selection and control is essential. We also like the suggestion of artwork, possibly from the University for Creative Art. The intention is said to be to provide an iconic representation of Epsom, but a careful system for approval of such a design should be put in place.

The incorporation of a feature to identify the station entrance within the context of the proposed large building is welcomed and was included in earlier schemes. The Design Evolution section of the Design Statement shows the development of this feature but we do not feel that a satisfactory solution has yet been found. We are not attracted by the vertical feature and feel that even more emphasis should be placed on the ground level design of the entrance.

An important element in the design is the appearance from the junction of High Street and Waterloo Road. The station corner is in full view from this point and the detailing of the hotel is therefore of great importance.

Bearing in mind the experience of Hudson House it is of major importance that adequate and timely inspections are carried to ensure that the designs, materials and other matters specified in any permission are strictly followed.

Uses

Policy IMP1 of the District Wide Local Plan suggests offices be included but the current market and national requirements have changed and we see no objection to housing use split in the way suggested in the application. The hotel use is appropriate to a station – more so than The Parade – and a limited amount of retail. Two quite large restaurants are proposed and it is necessary to bear in mind the many eating places already in existence in the town centre – of varying quality – and the very short life of some of them. We think it important, as must the developer, to secure prelets of good standard and covenant. The same applies, of course to the shops and the hotel.

Traffic Issues

We have for many years been advocating the provision of an adequate transport interchange at the station. There is clearly no room for this now, but proper provision should be made for buses, taxis and dropping off/picking up. We find the Traffic Assessment particularly disappointing in this respect. It presents the findings of detailed analyses and surveys, but fails to draw convincing conclusions.

The existing station forecourt is currently frequently congested, and demand will increase, even if only by the surprisingly modest amount predicted by the report. This activity would be transferred into the highway, inevitably causing worse congestion. It is extraordinary then for Solum to conclude that the reduced facilities available would represent an improvement on the current position.

Provision for deliveries and “kiss and ride” is provided by a small lay-by very close to the Waterloo Road junction. Even with rigorous enforcement of deliveries during the off-peak only, this would be inadequate to accommodate the demand particularly during the evening peak when there is usually a queue of waiting cars, well in excess of the four vehicles allowed for in the proposal. (Similar objections apply to the proposed taxi rank). Car use at the station is already remarkably low, by the report’s own figures, and it is highly unlikely that a travel plan would influence this to any measureable extent.

Claims of improved safety are similarly exaggerated and no figures are given relating to either vehicle or pedestrian accidents. Under the proposals, vehicle movement would be limited to the highway and the forecourt access/egress points removed. This removes some conflicts but these are, in effect, replaced by those presented by the use of the on-street taxi rank and the “kiss and ride” lay-by.

The junction with Waterloo Road is shown to be operating within capacity, but no attempt has been made to investigate the interaction with the Waterloo Road/High Street junction, the tail back from which blocks the Station Approach junction during peak periods.

In summary, we conclude that the use of the public highway as a transport interchange, a key part of the operation of the station, is unacceptable and appears to have been done simply to provide maximum development potential at ground level. We are surprised to see in the developer's comments that the County Council's highways department seem to have no objection to the proposal and that no suggestion has been made that a suitable forecourt should be provided within the curtilage of the building it serves.

Conclusion

This Society has for many years wanted to see a satisfactory and viable development of the station and the surrounding area. We see that the present proposal has been carefully evolved and is an improvement on earlier schemes. There are, however, many aspects we find unacceptable.

Although a decision has to be made on the scheme as submitted, we are very conscious that very little is being done to improve the facilities of the station itself and that an opportunity may be missed to provide a development which would become a landmark the town could be proud of in years to come

We do not accept the concept of high buildings on both sides of Station Approach; we consider the arrangements for monopolising the near lane of the highway instead of providing a service road to be wrong and we have other reservations as described in this letter. As you know, we are content to see good contemporary architecture but we believe that a more modest concept with lower buildings should be explored, possibly to include a curved service road beneath an overhang of the upper floors to create a better vehicle access and an identifiable location for the station.

In all the circumstances, we believe the application should be refused or deferred for further negotiation.

ALAN BAKER FRICS
Vice Chairman