



## JOHN SHARKEY & Co.

Strategic Property Advice to the Education Sector

### EPSOM & EWELL BOROUGH COUNCIL

#### PLAN E (EPSOM TOWN CENTRE): PROPOSED SUBMISSION DOCUMENT

#### COMMENTS FROM UNIVERSITY FOR THE CREATIVE ARTS

Ref No	Page No	Para No	Content	Comments	Legally Compliant	Soundness
1	6	1.9	<p>“Epsom Town Centre is the main focus for economic activity within the Borough. It is classified as a secondary regional centre in the South East Plan. The Town Centre provides a good range and choice of facilities and caters for a wide range of needs. As well as providing services and functions for those who live, work, study or visit the Borough, it also provides a network of meeting places and social spaces in the public realm.”</p>	<p>a. While the University is grateful for the reference to those who study in the Borough, it is nevertheless surprised that this document does not generally seem to encourage students to use the town centre, or to recognise, explicitly, the important role that the University plays in the life and economy of the town.</p> <p>b. Once those changes have been made, the document will then be sound as it will be in accordance with Central Government guidance.</p>	No	<p>Not Effective</p> <p>Not Justified</p> <p>Not consistent with national policy</p>
2	9	N/A	<p>This section of the document deals with land use, and this sentence appears under the second bullet point on this page            “Consideration needs to be given to type of residential units provided to ensure this contributes to the housing mix.”</p>	<p>a. The University assumes that, in keeping with the South East Plan and the Strategic Housing Market Assessment, the Council will bear in mind the housing needs of students.</p> <p>b. It would be useful for the document to make that explicit.</p> <p>c. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</p>	No	<p>Not Effective</p> <p>Not Justified</p> <p>Not consistent with national policy</p>

3	10	N/A	<p>The top part of this page sets out the “Objectives” so far as land use are concerned</p> <ol style="list-style-type: none"> <li>1. “Ensure that the Town Centre contains a well balanced mix of uses that meets the needs of the catchment population</li> <li>2. Ensure Epsom anchors its retail position, through improving the quality of retail mix</li> <li>3. Retain and enhance where possible a range of leisure, cultural and community facilities</li> <li>4. Ensure that Epsom remains a focus for employment uses and maintains and enhances the attractiveness of its location to existing and potential businesses</li> <li>5. Ensure high quality, higher density residential accommodation, which meets local needs is appropriately located within the Town Centre</li> <li>6. Seek opportunities to generate decentralised renewable and low carbon energy.”</li> </ol>	<ol style="list-style-type: none"> <li>a. While the University generally agrees with these Objectives, that is subject to the following :- <ol style="list-style-type: none"> <li>i. Please see the comment at reference number 2 above.</li> <li>ii. The University is surprised that the Council has not taken this opportunity of mentioning the importance of the University to the town centre, particularly as its statements in paragraphs 1.9 (with its reference to those who study in the borough) and 4.11 (where the Council refers to the importance of the University) imply that the Council is aware of this fact.</li> </ol> </li> <li>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ol>	No	<p>Not Effective Not Justified Not consistent with national policy</p>
4	10/11	N/A	<p>This section deals with “Movement and accessibility”.</p>	<ol style="list-style-type: none"> <li>a. It is disappointing that there is no recognition that the signage in and around the town centre (including between the University’s premises and the train station) needs to be improved.</li> <li>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ol>	Yes	<p>Not Effective Not Justified</p>

5	12	N/A	The phrase “wider Town Centre” appears halfway down this page and, while it also appears on a large number of occasions throughout this document, it is not defined in the document.	<ul style="list-style-type: none"> <li>a. A definition of “wider Town Centre” should be provided in the document.</li> <li>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ul>	Yes	Not Effective Not Justified
6	12/13	2.11	<ul style="list-style-type: none"> <li>a. This section deals with the “Identity, character &amp; management” of the town centre.</li> <li>b. The first key issue is “Strong historical associations are not adequately reflected in the town centre ..... It was once a spa town, famous for Epsom salts. It has had a long association with ... horse racing .... It is also a centre for creativity, with both the University for the Creative Arts and the acclaimed Laine Theatre Arts College being within Epsom. Currently the town centre is not making enough of these associations.”</li> </ul>	<ul style="list-style-type: none"> <li>a. While the Council, in this paragraph, recognises the importance of the University to the town, it is surprising that, read as a whole, the document does not appear to welcome the University, or its students, in the town centre.</li> <li>b. The necessary changes should be made and, once that has been done, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ul>	No	Not Effective Not Justified Not consistent with national policy
7	13	N/A	This page sets out the “Objectives” for “Identity, character and management :- 17. Strengthen the role and quality of the market as a central feature .... 18. Build upon Epsom’s identity, using its historic and current associations 19. Enhance the existing character and thereby improve the ‘sense of place’ 20. Promote the town as a high quality, safe destination 21. Establish a form of town centre management”	<ul style="list-style-type: none"> <li>a. While the University supports the principle of the second Objective, it feels that the following words should be added at the end “as a spa town, a university town and its links with horse racing.”</li> <li>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ul>	No	Not Effective Not Justified Not consistent with national policy

8	23	3.28	"The A24 runs through this area as part of the busy one-way system that circulates traffic around the Old Town and Market Place. The pedestrian and cycle links across the A24, particularly between the wider Town Centre and the .... University would benefit from improvements to these networks."	<ul style="list-style-type: none"> <li>a. The second sentence implies that the University is not part of the wider town centre.</li> <li>b. The Council should clarify this aspect, in order that the University can determine whether it wishes to comment further.</li> </ul>	Yes	Not Effective Not Justified
9	24	3.30	The first sentence is "Plan E will protect and enhance the area's employment offer through the application of its Town Centre boundary policies."	<ul style="list-style-type: none"> <li>a. The document does not state what the "Town Centre boundary policies" are.</li> <li>b. The Council should clarify this aspect, in order that the University can determine whether it wishes to comment further.</li> </ul>	Yes	Not Effective Not Justified
10	25	3.39	The second sentence states "Consequently, for Epsom to remain a sustainable place to live and work the use of existing employment sites will need to be optimised."	<ul style="list-style-type: none"> <li>a. The phrase "live and work" should be changed to "live, work and study", particularly bearing in mind the importance that the South East Plan attaches to higher and further education (see for example Policy S4).</li> <li>b. Once that has been done, the document will be sound as it will be in accordance with Central Government guidance.</li> </ul>	Yes	Not Effective Not Justified
11	26	N/A	The first part of the page contains the Vision for Epsom Railway Station and Station Approach, and contains the sentence "The Station will continue to be a busy and vibrant sustainable transport hub and will provide a welcoming environment for residents, shoppers, workers and other visitors to the Town."	<ul style="list-style-type: none"> <li>a. The phrase "residents, shoppers, workers and other visitors"" should be changed to "residents, shoppers, workers, students and other visitors", particularly bearing in mind the proximity of the station to the University and the use of the station by students.</li> <li>b. Once that has been done, the document will be sound as it will be in accordance with Central Government guidance.</li> </ul>	Yes	Not Effective Not Justified

12	28	4.3	<p>This section deals with the mechanisms that will be used to deliver the objectives and vision, and the first bullet point states "Policies for guiding land uses within a defined town centre boundary. It is important that an appropriate mix of uses, such as retail, employment floorspace, leisure facilities and new housing, is maintained to ensure Epsom's long term vitality and viability. These must meet the needs of the Town Centre and be appropriately located."</p>	<p>a. While the University agrees with the main thrust of this statement, the final sentence should be amended so that it is clear that it is the needs of those who use the town centre that should be met.</p> <p>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</p>	Yes	<p>Not Effective Not Justified</p>
13	28	N/A	<p>The third bullet point on this page states "Improving the management and promotion of Epsom will help to reinforce its role as a high quality, family-friendly market town attracting visitors, shoppers, retailers and businesses to the town centre."</p>	<p>a. This should be changed to "Improving the management and promotion of Epsom will help to reinforce its role as a high quality, family-friendly, and University market town attracting visitors, shoppers, retailers, businesses and students to the town centre.", particularly bearing in mind the importance attached to higher and further education in the South East Plan (see for example Policy S4) and the fact that Epsom is now a University town.</p> <p>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</p>	No	<p>Not Effective Not Justified Not consistent with national policy</p>

14	30 (and Map 8)	N/A	This section (and Map 8) deals with the town centre boundary, which excludes the University's campus.	<p>a. The University is disappointed and surprised that the Council has excluded its campus from the town centre, not least because the inclusion of the campus would :-</p> <ul style="list-style-type: none"> <li>i. Enhance the town centre</li> <li>ii. Allow the Council to describe Epsom as a "University town"</li> <li>iii. As stated in Policy E1, "Town Centre uses will .... include .... community facilities"</li> <li>iv. Be in accordance with central government guidance (for example PPG 13)</li> <li>v. Be in accordance with the South East Plan, the relevant extract of which is included in Annex A.</li> <li>vi. Assist this document in being more locally distinctive.</li> <li>vii. Give effect to the Council's statements in paragraphs 1.9 (with its reference to those who study in the borough) and 4.11 (where the Council refers to the importance of the University)</li> </ul> <p>b. The University's campus should therefore be included in the town centre boundaries and, once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</p>	No	<p>Not Effective Not Justified Not consistent with national policy</p>
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15	31	N/A	<p>The first part of this page sets out Policy E2 which states “New development will deliver between 635 and 775 new residential units within the Town Centre during the period between 2010 and 2026. The key opportunity sites, as defined on the Proposals Map, will deliver a significant proportion of this as follows:  Upper High Street and Depot Road site: Approx 130 units  Gas Holders site, East Street: Approx 250 units  Epsom Station site: Approx 100 units  The remainder of the target will be delivered by the other opportunity sites identified by Plan E and existing housing commitments.”</p>	<p>a. The Policy and/or supporting text should recognise that the housing needs of students should be taken into account, bearing in mind the close proximity of the University’s campus, PPS3, the importance attached to higher and further education in the South East Plan, the Strategic Housing Market Assessment, etc.  b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</p>	Yes	Not Effective Not Justified
16	35	N/A	<p>This section deals with employment.</p>	<p>a. The word “employment” is not defined, and should be.  b. The Council should define the word, for the avoidance of any doubt, and should take account of PPS4. This will then allow the University, and others, to determine whether any comments need to be made.</p>	Yes	Not Effective Not Justified

17	36	N/A	<p>This page includes Policy E6 which states “The overall level of leisure provision within the Town Centre will be maintained and in specific locations enhanced. Leisure and cultural facilities, and other family friendly uses that contribute to the evening economy will be supported. Suitable locations for such uses include South Street and Derby / Oaks Square.”</p>	<p>a. The University is surprised that there is no reference to it in this section, particularly bearing in mind :-</p> <ul style="list-style-type: none"> <li>i. The South East Plan (see for example Policy S4)</li> <li>ii. The Council’s statement in paragraph 1.9 that the town centre provides services and functions for those who study in the borough.</li> <li>iii. The Council’s statement in paragraph 4.11 that the University is important to the town centre.</li> </ul> <p>b. The Council should make the necessary changes and, once that has been done, the document will then be sound as it will be in accordance with Central Government guidance</p>	No	<p>Not Effective Not Justified Not consistent with national policy</p>
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18	40/41	4.53	<p>“Public art contributes to the identity of a town, helping to make it locally distinctive and helps to prevent becoming a ‘clone town’. Examples of public art can include sculpture installations, murals, distinctive street furniture and lighting. Public art can also be embedded within the townscape forming an integral part of building design. In this respect it can be incorporated within building materials and shop signage. Public art can also contribute towards the Town’s image. For example, Epsom has a long relationship with the horse racing industry and equestrian themes can serve reinforce this association. Epsom currently has limited public art for a town of its size.</p> <ul style="list-style-type: none"> <li>• Encourage artistic details to be included in the design of new buildings</li> <li>• Working with partners to deliver new public art in the form of sculptures and murals in desirable locations across the town to act as focal points and add interest</li> <li>• Agree a series of unifying themes that reflect the Town Centre’s historic character and appearance and contribute towards the image of Epsom as a family orientated market town.”</li> </ul>	<p>a. The University is surprised, and disappointed, that the Council has not taken this opportunity of working the University to ensure that the Council’s aims on public art are met, particularly as the University is a specialist University dealing with the creative arts.</p> <p>b. This is even more the case bearing in mind :-</p> <ol style="list-style-type: none"> <li>i. the Council’s statement, in paragraph 4.11, that the University is important to, and has important links with, the town centre.</li> <li>ii. that this paragraph refers to the town’s association with the horse racing industry, and paragraph 2.11 referred to the town’s association with the University as well as the horse racing industry.</li> <li>iii. that Appendix 3 lists the University as a “Policy delivery partner” on the “Public realm”.</li> </ol> <p>c. The necessary changes should therefore be made and, once that has been done, the document will then be sound as it will be in accordance with Central Government guidance.</p>	Yes	Not Effective Not Justified
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19	46/47	Policy E13 and paras 4.76 – 4.80	This part of the document deals with “Changes to the road network”	<p>a. Given the major problem that the town centre experiences on highway matters, it is very surprising that the document does not set out, even in summary form, the options considered between the Council and Surrey County Council, together with the perceived advantages and disadvantages of each such option.</p> <p>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</p>	Yes	Not Effective Not Justified
20	50 – 69	N/A	This section sets out information on “Strategic opportunity sites” and “Other opportunity sites”	<p>a. The document should indicate that the Council would not object to each of these sites, and certainly the “Strategic opportunity sites” and those that are close to the University’s campus, being developed partly for education uses, and for providing an element of student housing, bearing in mind PPS3, PPS4, the South East Plan and the Strategic Housing Market Assessment.</p> <p>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</p>	No	Not Effective Not Justified Not consistent with national policy

21	70 – 76	N/A	These pages contain the Glossary.	<ul style="list-style-type: none"> <li>a. There should be definitions of :- <ul style="list-style-type: none"> <li>i. “employment”: please see comments beside reference number 16 above.</li> <li>ii. “wider town centre”: please see comments beside reference number 5 above.</li> </ul> </li> <li>b. This will then allow the University, and others, to determine whether any comments need to be made.</li> </ul>	Yes	Not Effective Not Justified
22	73	N/A	This page includes a definition of “Infrastructure: A collective term for services such as roads, electricity, sewerage, water, education and health facilities.”	<ul style="list-style-type: none"> <li>a. The words “at all levels” should be inserted in brackets after the word “education”, in order to accord with central government guidance.</li> <li>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ul>	Yes	Not Effective Not Justified
23	81	N/A	This section of the document deals with “Implementation”, and this page records the fact that the University, together with others, will help to deliver the Objectives on the Public Realm.	<ul style="list-style-type: none"> <li>a. The University looks forward to working with the Council, and others, on this matter.</li> <li>b. The University is particularly pleased that this document must be a spatial document, rather than just a land-use one, so that it has to deal with social, economic and environmental matters, including education.</li> </ul>	N/A	N/A

24	85	N/A	This section deals with the “Infrastructure Delivery Plan”, and includes a definition of “Social & Community Infrastructure: Affordable housing, Education, Employment, Benefits / Tax, Children’s Services, Health, Gypsies & Travellers, Post Offices, Community Services, Culture, Leisure”	<ul style="list-style-type: none"> <li>a. The words “at all levels” should be inserted in brackets after the word “Education”, in order to accord with central government guidance.</li> <li>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ul>	Yes	Not Effective Not Justified
25	91	N/A	This section deals with the “Infrastructure Delivery Plan” and, while it includes a heading of “Community Services”, there is no reference to education (at all levels).	<ul style="list-style-type: none"> <li>a. There should be a reference to education (at all levels), to accord with central government guidance.</li> <li>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ul>	Yes	Not Effective Not Justified
26	94	N/A	This section deals with the “Infrastructure Delivery Plan” and, while it includes a heading of “Community Services”, there is no reference to education (at all levels).	<ul style="list-style-type: none"> <li>a. There should be a reference to education (at all levels), to accord with central government guidance.</li> <li>b. Once that change has been made, the document will then be sound as it will be in accordance with Central Government guidance.</li> </ul>	Yes	Not Effective Not Justified

27	N/A	N/A	The whole document	<ul style="list-style-type: none"> <li>a. The University is surprised that, in general terms, the document does not seem to encourage the University or its students to use the town centre.</li> <li>b. This is even more surprising when one takes account of the following :- <ul style="list-style-type: none"> <li>i. The South East Plan (see for example Policy S4)</li> <li>ii. PPS4</li> <li>iii. The Council's statement in paragraph 1.9 that the town centre provides services and functions for those who study in the borough.</li> <li>iv. The Council's statement in paragraph 4.11 that the University is important to the town centre.</li> </ul> </li> </ul>	No	<p>Not Effective Not Justified Not consistent with national policy</p>
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NB The University has not yet decided whether it wishes its objections to be dealt with, at the Examination in Public, by Written Representations or by participation at the oral part of the Examination.