



**Plan E – Epsom Town Centre Area Action Plan
Matters and Issues for Examination**

Epsom & Ewell Borough Council’s Responses

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Main Matter 1

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1) Does the AAP satisfy the legal requirements, in particular:

1.1) Has it been prepared in accordance with the Local Development Scheme?

Yes. The AAP was prepared in accordance with the Council's LDS.

The Council has prepared a revised LDS, which has been approved by the Planning Policy Sub Committee. However, following the change in government and upon the advice of the GOSE, the Council has not submitted it. The revised LDS is available in Appendix 1.

1.2) Has it been prepared in accordance with the Statement of Community Involvement and Regulations?

Yes. The AAP has been prepared in accordance with the Council's SCI, and the Regulations. Evidence of this process is set out within the Council's Statement of Legal Compliance (supporting document ref G4).

1.3) Has it been subject to sustainability appraisal?

Yes. The AAP has been the subject of a sustainability appraisal process. Evidence of this process has been submitted in the form of a Sustainability Appraisal Report (supporting document ref A).

1.4) Has it had regard to national policy

Yes. The preparation and production of the AAP had regard to current national policy. Evidence for this is set out within a document produced by the Council in support of the Issues & Options (under Regulation 25) engagement stage. This can be found in Appendix 2.

The Council notes that subsequent to the publication of the Plan E submission document revisions to national policy, most notably Planning Policy Statement 4: Planning for Sustainable Economic Growth, have been introduced. In spite of this Council believes that Plan E remains sound in respect of national policy.

1.5) Has it had regard to any Sustainable Community Strategy (SCS) for the area?

Yes. The Council has adopted the approach that Plan E (along with other LDDs) serves as the policy delivery mechanism for its SCS. Consequently, the preparation and production of the AAP has actively involved the Local Strategic Partnership and other key local partners. This is evidenced within the statement of legal compliance (supporting document ref G4). Plan E policy and supporting evidence provides strong links to the SCS. The Local Strategic Partnership economic sub group holds responsibility for delivering Plan E.

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The Council continues to work closely with the Local Strategic Partnership to deliver Plan E this is evidenced in the recently completed report "The Way Forward – Strengthening the Future of Epsom Town Centre". The report is attached in Appendix 3.

1.6) Overall has it emerged from an open and transparent process that demonstrates how and why its elements were selected, in consultation with the public and other stakeholders?

Yes. The Council believes that preparation and production of Plan E involved a transparent process for engagement and option generation. This is evidenced by matrices and supporting statements produced for the Submission Paper Policies (ref G1 & 2).

2) Since the publication of the AAP the Regional Spatial Strategy has been revoked. What implications does this have for the AAP? Are any adjustments to text required? If so, please state what they are

The Council confirms that following careful consideration, it does not consider the revocation of Regional Spatial Strategies has an impact upon the submitted plan. Consequently, the Council is not seeking to make significant changes. This was formally stated in a letter to the Inspector, dated 26 July 2010 (Document reference L on the Council's website).

The Council has examined the explanatory text of the submitted plan and identified where it believes some changes could be made to assist clarity. The Council has submitted a schedule of these minor changes to the Inspector. The Council suggests that these minor changes are introduced following the Examination in Public Hearing.

3) Is the relationship to the Local Plan and any saved policies which will be superseded adequately explained?

Yes. The Council has produced a list of the saved Local Plan policies which will be superseded by Plan E and provided an explanation. This is set out in supporting document G7.

4) Is the plan consistent with the Core Strategy?

Yes. The Core Strategy guided the contents of Plan E and the Council has produced an assessment of consistency which can be found in the Statement of Legal Compliance (supporting document G4). Plan E is the key delivery mechanism for Core Strategy policy CS14: Supporting Epsom Town Centre and Local Centres.

5) I have a schedule of Pre-Examination changes. I also have suggested changes in response to GOSE issues (June 2010). Are any other changes proposed? Is it correct that appendix 4 would be removed from the AAP?

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The Council would like Appendix 4 (Plan E Infrastructure Delivery Plan) to be removed from Plan E, which will enable this document to be periodically updated.

Following the revocation of the South East Plan, the Council has identified a number of minor changes to the Plan E text. These are attached as Appendix 4.

6) *Is the housing trajectory to be attached to the plan? How is that to be incorporated into the document? Will it also incorporate a phasing table? Are the projected timescales realistic?*

The Council suggest that a phasing table containing the Plan E opportunity sites that have housing components, be attached to Plan E as an appendix. This can be seen in Supporting Document 1 and is attached in Appendix 5. It could then be referenced in the supporting text of the 'Housing Capacity in the Town Centre' section of the plan at paragraph 4.18 (e.g. *The Plan E Opportunity Sites housing phasing table is provided in appendix 5*). As the housing trajectory is updated on at least a yearly basis, and is likely to be altered substantially to reflect the Site Allocations that emerge through the Delivery DPD in the next two years, the preferred approach would not be to attach the borough wide housing trajectory to this plan.

A variety of evidence was used to inform the projected timescales for the delivery of the opportunity sites. For the sites that include a housing component, the rational for each is set out below:

E14. A recent application on the Depot Road & Upper High Street site was withdrawn before determination, and it is likely that there will be more interest and other applications in the near future. Planning permission has also been granted at the United Reformed Church. Details of this were provided in the 'additional documents requested by the Inspector- May 2010'. There is also a commitment from the Council to produce a Development Brief for the whole site. It is therefore considered appropriate to estimate it's commencement to be within the first five years of the plan period.

E15. The timescale for the delivery of this site is likely to be longer than the other sites, mainly due to multiple ownership and the nature of the constraints that exist on the site. There have been previous applications on the Lintons Centre part of the site, which may come forward in the first five years of the plan period. There has also been a previous application on the Thames Water owned part of the site but this has now expired. It is thought that due to the complexity of this site, it is likely to be developed towards the end of the plan period.

E16. Epsom Station has received planning permission and is due to start this year. It is therefore expected to be developed within the first five years of the plan period.

E17. Of the four opportunity sites in policy E17 that have housing components, the Magistrates Court site has recently been refused and it is likely that the developers will continue to pursue a development of some form on that site in the near future. It is therefore expected to be developed within the first five years of the plan period. Discussions with Surrey County Council regarding the future of the Emergency Services Uses on Church Street are ongoing.

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The TK Maxx Store and land rear of the Albion Public House are considered less likely to come forward for development in the first half of the plan period as interest in developing these sites has not been raised with the Council at this point. However due to the low density uses currently on these sites, it is considered important to identify them for their development potential in the future.

7) *What is the rationale for the Town Centre boundary and how was it formulated? Provide explanation that it is consistent with the Core Strategy and PPS4. What implications does the exclusion of parts of the Town Centre shown on the Local Plan Proposals Inset Map have? Has an updated Proposals Map been prepared?*

The Core Strategy committed the Council to producing an Area Action Plan. Policy CS14 provides the broad policy context which directs the development of Plan E. Defining a boundary helps to provide focus to the Core Strategy policy and the boundary defines the uses set out in policy CS14.

As part of the Regulation 25 engagement the Council tested various options for the Town Centre boundary. Three options were set out in the Issues and Options Paper and comments were invited on these with the opportunity to suggest any alternative options. These options, the feedback received and other supporting evidence are discussed in greater detail in supporting document G1.

The Council considers the Plan E Town Centre boundary is in accordance with the principles set out in PPS4. This sets out the main uses to which the PPS4 Town Centre policies apply. These include retail development, leisure, entertainment facilities and the more intensive sport and recreation uses, offices, arts, culture and tourism development. Annex B of PPS4 also provides a definition of a Town Centre, this being 'a defined area, including the primary shopping area and areas of predominantly leisure business and other main Town Centre uses within or adjacent to the primary shopping area'.

The Town Centre boundary within Plan E identifies the extent of commercial activities and seeks to concentrate future growth, through intensification, upon the existing and opportunity sites located within this boundary. It also encloses a number of areas in residential use that are functionally mixed-in with surrounding commercial town centre uses, for example Capitol House along Church Street. The boundary excludes some areas that were previously included within the Local Plan Proposals Inset Map. Notably, the small local centre at Waterloo Road/ Chase Road, located to the north of the railway line and the predominantly residential areas at Pike's Hill, west of Church Street and at Linton's Lane have been excluded on the grounds that they function separately from the town centre. The Council intends to address the issue of local centres in the forthcoming Delivery Development Plan Document.

The Council has produced an updated Proposals Map which incorporates the Town Centre boundary and the Plan E boundary. This is attached in Appendix 6.

8) *The University for the Creative Arts lies outside the Town Centre boundary. What implications do you see that having on decisions about*

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development relevant to that institution, particularly the provision of student housing and any on site development proposals? Is there any factual evidence about the university floorspace that is relevant and if so why? Are there any future plans for the institution relevant to the AAP?

While the UCA may not physically fall within the Town Centre boundary as identified within Plan E, this does not reduce the importance of the University to the Borough. The Council does not consider the fact that the UCA lies outside of either the original (as identified within the saved Local Plan) or the proposed boundary as having any implications for Plan E, or the development management process in general. The UCA has recently intensified its teaching facilities within its current site (Planning application 09/00483FUL). There are no known proposals for new teaching facilities outside of the current campus site.

Since 2007, there have been a number of proposals seeking the development of new student accommodation. A schedule of these proposals is included in Appendix 7. Some of these proposals fall within the Town Centre, others lies outside of the plan area boundary. On the basis that new student accommodation meets an identified need (see below), the Council does not consider proposals from this type of residential provision to be in conflict with either the Core Strategy (Policies CS7, CS8 and CS9) or Plan E.

The UCA outlined its plans to the Council during a meeting on 1 October 2008. At that meeting the UCA explained that they have a ten year plan/ strategy covering the period 2006 – 2017. The Council has subsequently had sight of the plan, which covers all five of the Colleges sites (not just Epsom). This is a strategic plan with limited site specific detail of the College's intentions.

Nevertheless, the College did state that they are seeking to increase the number of students studying at the Epsom Campus from 1500 to 3000 during the plan period. This would require a new teaching block and workshop facility. The new teaching block has permission and is now under construction (Planning application 09/00483FUL).

The College stated that their priority was providing sufficient student accommodation. They have stated to the Council that they believe that at their current (2006) size, they are between 100 – 150 student accommodation units short in terms of meeting need. The College stated that an increase in student numbers to 3000 would generate a requirement for an additional 100 – 150 student units.

The Council does not believe that the student accommodation needs generated by the UCA will have an impact upon the delivery of Plan E's objectives. Of recent planning permissions (since 2007), 69 units have been completed at Wilberforce Court, 11 at Finachem House and 14 at Temple Road. There is permission for a further 53 units at the Linton's Lane site. There are currently two planning appeals that could yield an additional 18 units. A proposal that is currently at pre-application stage could yield between 60 – 70 additional units. This suggests that the student accommodation needs, as identified by the UCA, could soon be met.

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- 9) ***Is it a realistic vision for The Old Town and Market Place that through traffic will be substantially reduced? (The Vision). Please respond to the points made by Surrey County Council.***

Surrey County Council's representation considers that the vision that through traffic will be substantially reduced in the Old Town / Market Place is unrealistic. It is suggested that the wording should be changed to 'through traffic will be effectively managed'. While the Council understands the views set out in the representation, it should be noted that these are not shared by the County Council's Highways department. Modelling work carried out by Surrey Highways in relation to the return of South Street to two way traffic has shown that traffic volumes in the Old Town / Market Place area could be reduced by around a third. This report is available within supporting document G2 (supporting evidence for policies E10 to E13, document 3). While it is acknowledged that these vehicles may still be on the road network, they will no longer need to pass through this part of the Town Centre, as there would be an alternative option available and therefore traffic volumes in this area will be reduced. It is considered that the vision statements contained within Plan E should be ambitious and reflect the aims for specific areas of the Town Centre.

Main Matter 2

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Town Centre Boundary policy E1:

1a) Explain the use of the word 'principally' in line 2 of policy E1. Where else would these policies apply

The word 'principally' has been used because some policies within Plan E also cover some peripheral areas that lie outside of the Policy E1 boundary; most notably Policy E15, which extends beyond the Policy E1 boundary. This is explained in the Council's answers dated 11 June 2010.

In response to a request for added clarity by the Inspector the Council has identified a plan area boundary for Plan E, within which the Plan E policies apply. The Council consulted upon this matter of clarity for a six week period ending upon Friday 20 August 2010. The responses received to this consultation are attached as Appendix 8.

1b) How does this policy relate to the plan area boundary?

For clarity, Policy E1 is a policy boundary that sits (in its entirety) within the plan area boundary.

1c) Should this policy include a wider mix of uses such as education and student housing?

No. It is not the Council's intention to prescribe all potential town centre uses. The policy does not exclude these two uses. The Council acknowledges that these two specific uses, along with others not specifically identified within the policy wording could be appropriate town centre uses.

1d) Would these uses be incompatible with policy E1 as drafted?

No. The Council acknowledges that education and student accommodation could be considered appropriate uses. The Inspector is asked to note that the policy explicitly states that town centre uses include higher density housing, which could encompass student accommodation, and community and employment uses, which could also include education uses.

Housing capacity policy E2:

2) Is there any need to include the upper figure of 775 residential units and how does the use of an upper figure comply with government policy? Should the policy refer instead to a minimum of 635 new residential units?

The policy provides a range to identify the likely amount of housing which may be yielded from the Town Centre over the plan period. The upper figure is not intended to be used to limit the amount of housing. Having a range provides some certainty as

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to how much housing will be yielded from the Town Centre to assist the Council in identifying sources of housing supply to be set out in the housing trajectory.

The Council considers that the upper figure will aid in the management of new development in the Town Centre, helping to ensure there is not an over proliferation of one use at the expense of others. However, should the Inspector consider this approach unsound, the Council would not be adverse to the removal of the upper figure as it would not affect the main purpose of the policy.

3) How has the housing yield in paragraph 4.16 been calculated?

Details as to how the housing yield for the Town Centre was calculated are set out in Supporting Document G2 (supporting statement for policy E2).

4a) How has the Council arrived at the figures for housing provision on the key opportunity sites? Will the other town centre sites be capable of providing the remainder?

Details as to how the housing yields for the key opportunity sites were calculated and how the remainder of the housing provision figures can be met are set out in Supporting Document G2 (supporting statement for policy E2).

4b) What are the implications of building height restrictions on housing figures?

The Council considers policies E2 and E7 to be compatible; that the housing range set out in policy E2 can be met within the height policy. A conservative approach was taken in the calculation of housing numbers for the Town Centre. An important source of information in the calculation of yield was the SHLAA, which took into account the character and existing densities in the surrounding area in the assessment of yield.

In addition, the Council has carried out some basic indicative mapping for the Utilities site, to ensure the scale of development proposed in policy E15 could be accommodated on the site, taking into account the height policy E7. This can be found in Appendix 9. This demonstrates that a density of around 100 units per hectare will be achieved for the housing units on the site (within height policy), which is considered an acceptable gross density for a site within this part of Epsom Town Centre.

Town Centre retail capacity policy E3:

5) Explain how the plans for retail growth in policy E3 comply with PPS4. Explain why projections beyond 2018 should be treated with caution and the implications of this for the policy. Should this be taken out of the policy and included in the text? What are the implications of breaking down the floorspace in the way that it is shown in the policy? Is the loss of trade to other

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centres and to Sainsbury's in Kiln Lane something that the Plan should address?

The Council's retail planning experts, GVA Grimley have responded to question 5. The response can be found in Appendix 10

Town Centre retail area and primary & secondary retail frontages policy E4:

6) How has the core area been defined? Policy E4 does not include any definition of how 66% is measured. Is this number of units, length of frontage, floorspace or some other method? How is a significant break in the retail frontage defined? These explanations should be included in the explanatory text. Justify why takeaways are more suited to being outside the primary and secondary frontages (paragraph 4.28).

The Council's retail planning experts, GVA Grimley have responded to question 6. The response can be found in Appendix 11

6d) Explain the penultimate sentence in paragraph 4.23.

The Council considers that while this sentence is relevant to Plan E, it does not relate well to this section and therefore may be deleted.

Town Centre employment floorspace provision policy E5:

7) Are the floorspace figures based on up to date evidence? What is the rationale for the floorspace figures and why is it a range?

Yes, the floorspace figures are partly based upon updated evidence (2009) from the Employment Land Review (2006). This shows the estimated levels of B1, B2 and B8 floorspace the Borough will require up to 2026. Due to the high levels of accessibility in the Town Centre it is considered that high density employment uses are the most suitable to maximise the efficient use of land and alternative sites for such uses within the Borough are limited. The updated floorspace need figures have shown that the Borough is estimated to require around 2,500m² of B1 floorspace by 2016.

Over the past few years there has been pressure for higher value land uses to come forward in place of employment land. Appendix 12 sets out the losses of employment land within the Borough, which shows that 14,143 m² has been lost to residential uses, while 255 m² has been lost to other employment generating uses. Therefore there is considered a need for policy intervention to retain an appropriate level of provision.

Policy E5 states that the Town Centre will deliver between 6000 to 7000m² of new employment floorspace. It is recognised that a proportion of the office stock within Epsom is ageing (as confirmed by local agents in the Borough as part of the Regulation 25 engagement) and the delivery of new floorspace will enable the release of less fit for purpose stock. It is also recognised that many forms of

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employment do not fall within the traditional B use classes. The Council encourages other forms of employment sources, for example hotel provision and healthcare uses to come forward. This is compliant with PPS4 which considers development that provides employment opportunities to be economic development.

The floorspace amounts identified in the policy will allow for the provision of new high quality, high density employment generating floorspace (for example new offices and other non B use employment generating uses), while enabling the loss of some less fit for purpose employment space. Identifying a range was intended to provide some flexibility as to the amounts of floorspace that could come forward in the Town Centre. However, should be Inspector wish to remove the range, the policy could be reworded to state 'around' 6,000m², which Officers consider would not affect the purpose or soundness of the policy.

Leisure, cultural and community facilities provision policy E6:

8) Whether any other suitable locations need to be mentioned.

The Council's retail planning experts, GVA Grimley have responded to question 8. The response can be found in Appendix 13.

Town Centre building height policy E7:

9a) Whether this policy is overly prescriptive and whether it complies with national policy.

The Council considers the policy to have the correct balance between being prescriptive while providing flexibility. The main purpose of the policy is to protect and enhance through new development the distinctive characteristic of overall relatively low building heights in Epsom Town Centre. This is achieved through specifying the maximum heights for development, while offering some flexibility in the allowing taller developments in some areas. In addition the second part of the policy sets out further considerations such as the proximity of Listed Buildings which will influence the desirable height of a building. This part of the policy is more subjective. Further references to the flexibility of the policy are referred to in the other answers to policy E7 below.

The policy is considered to be in accordance with national policy.

Planning Policy Statement 1: Delivering Sustainable Development states that 'Design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout and access of new development in relation to neighbouring buildings and the local area more generally' (para 38). It is considered that policy E7 provides the correct amount of prescription and detail to achieve the desired outcome i.e. protection of the distinctive characteristics of Epsom Town Centre.

Planning Policy Statement 5: Planning for the Historic Environment states that, 'Local Planning authorities should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic

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environment. The consideration of design should include scale, height, massing, alignment, materials and use' (para HE7.5). This is particularly relevant to Epsom when considering the large proportion of the Town Centre which is designated as a Conservation Area or adjacent to surrounding Conservation Areas and the number of listed and locally listed buildings.

Other evidence set out in Supporting Document G2 (supporting statement for policy E7) demonstrates that height is a local design issue.

9b) The areas are not finely drawn. What implications would that have for development control and the clarity of the plan? Why have the boundaries been drawn in the way they have since the up to 16m areas do not follow any property boundaries on the ground? What is the reasoning for the boundaries?

Having examined the Town Centre height survey, the Council considered that there would be areas where taller buildings could be accommodated without undue detriment, and sought to identify these locations, taking into account the need to protect more sensitive areas such as residential areas / Conservation Areas. Further details on how these areas were defined can be found in Supporting Paper G2 (background evidence to policy E7). The map notation is intended to be indicative. The Council considers that precise boundaries would have resulted in an overly prescriptive approach. The Council believes that the proposed policy approach provides flexibility, allowing proposals to be considered on a site by site basis. An example of this could occur when a development site falls across the 12 and 16 metre boundary.

In applying the policy there would be a degree of interpretation by the Development Management Team on the more subjective elements. Throughout the development management process, including any pre-application discussion, advice will also be available from the Council's Design and Conservation Officer. The Council encourages pre-application discussions with developers and does not charge for this service.

9c) Is the roof height and angle justified?

Yes. The aim of the policy is to keep any roof which is above the maximum height policy specified for that location from appearing as an additional storey. It should remain subservient to the remainder of the building. Removing the 45 degree angle from the policy would make its interpretation very subjective. The Council considers 45 degrees a reasonable angle as anything greater could result in the roof beginning to look like another storey.

The maximum height of the roof above the height policy is 4 m and is broadly equivalent to the maximum height of a storey. This is considered a reasonable height and one which would avoid excessively tall roofs which could be utilised as additional storeys. This is shown diagrammatically in Appendix 14.

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Within the policy it would be possible to utilise the roofspace as living space, through the use of dormers / rooflights, although whether this is acceptable or not would depend on the merits of the individual proposal and its location.

9d) What are the implications of building height restrictions on housing density and floorspace provision figures?

The Council is confident that the level of development identified for the Town Centre can be accommodated within the building height restrictions. While it is acknowledged that development sites within the Borough are limited, the Council is not prepared to compromise the character of the Town Centre to achieve higher densities and deliver greater amounts of floorspace. This position is supported by local representations.

9e) Reference has been made to another Inspector's views about a similar policy in Ashford. What implications does that have for my consideration?

The Council does not believe it has any implications for the Inspector's consideration for the following reasons.

Ashford Council has adopted an Area Action Plan for Ashford Town Centre, which contains policies in relation to building heights. Following the Examination of the Area Action Plan Submission Document, the Inspector made some comments and variations to the building height policies. The text below provides an overview of the Ashford situation and suggests how this may be considered in relation to Epsom.

While both Epsom and Ashford are addressing the issue of the height of new development, it is important to consider the context of the two towns. Ashford had been identified as a growth area in the South East Plan and therefore a substantial amount of change will be taking place over the plan period, which is reflected in their Area Action Plan. Over a third of the land within the Ashford Area Action Plan boundary has been designated as a series of Development Sites. In comparison Epsom is not a growth area and the amount of development within Town Centre over the plan period will be significantly less, with only two strategic development sites.

In their Submission Document Ashford Council had proposed an overarching policy for the plan area which included the following;

*'F) Create attractive and vibrant main streets by achieving a **building form of 4 to 6 storeys** fronting these streets, with active ground floor frontages and uses that respond to the agreed hierarchy of streets and open spaces.'*

The site specific policies also made a number of references to the height of development, specifying in some cases where taller buildings may be appropriate. The height of a storey was also clarified in the supporting text.

The Inspector made the following comments on this policy in the binding report: 'The guiding principle stipulates a building form of 4 to 6 storeys which may be appropriate when considering individual streets and locations, but in the wider context, I consider to be too prescriptive. A general limitation on building height and form has not been properly justified and would be inflexible in practice.'

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These comments resulted in the following change being made to the policy wording in the Guiding Principles:

*'F) Create an attractive and vibrant main streets by achieving **appropriate building forms** fronting these streets, with active ground floor frontages and uses that respond to the agreed hierarchy of streets and open spaces.'*

A number of minor changes were also made to the height references in the site specific policies.

Epsom & Ewell Officers have contacted the Ashford Policy Officers to seek further information on the height policy, including how it was developed and their views on the outcome of the Examination. From conversations it is clear that while Ashford Council had accepted the growth point status, it was not willing to compromise the character of the Town and therefore a general height policy was developed. The evidence to support this policy was quite strategic in nature, for example there was a Town Centre Development Framework which addressed the height issue, although there appeared to be a lack of specific detailed evidence. Ashford Officers consider that while the policy wording has been altered from what was originally proposed, the policy still achieves what was intended, as many of the site specific height requirements have been retained.

The context of Epsom and Ashford is very different and there are further differences in the way the policies have been developed. The evidence to support the Epsom policy is at a much finer grain, with a survey of building heights being carried out and specific consideration of influencing factors such as the proximity of residential areas, public open spaces and Conservation Areas. Further detailed information on the development of Policy E7 can be found in supporting document G2. Consequently the Council does not believe that the Inspector's views on the Ashford policy have any relevance to the situation in Epsom.

9f) On what sites has there been pressure for taller buildings?

There has been pressure for taller buildings on a number of sites in the Town Centre;

- Hudson House, Station Approach (building opposite the station, now developed) – planning application number 04/01057/FUL;
- The Station (planning permission granted) – planning application number 09/00824/FUL;
- Upper High Street / Depot Road site (application withdrawn) – planning application number 09/00650/FUL;
- The Comrades Club, The Parade (appeal refused) – planning application number 08/01453/FUL;
- The Magistrates Court (application refused) – planning application number 10/00071/FUL; and
- Pickard House, Upper High Street (pre-application discussions)

It is considered that the addition of increasingly tall buildings in the Town Centre can collectively threaten the distinctive character of Epsom and a specific policy is required to manage this risk.

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9g) What are the implications of paragraph 4.41 on redevelopment proposals?

The Council acknowledges that development has occurred in the past which has proved not to be popular with local communities and is keen to ensure such scenarios are not repeated. Policy is constantly evolving and the Council is placing greater emphasis on protecting and enhancing the character of the Town Centre. Therefore what may have been acceptable in the past may not be considered acceptable in the future or be used as a benchmark for new development.

Town Centre energy generation policy E8:

10) What progress has there been on producing the Climate Change Strategy?

Progress has been made on the production of the Climate Change Strategy. The County wide Climate Change Strategy was adopted by the Council in January 2010. It was accompanied by an outline Climate Change Action Plan and the Council's Climate Change Group were tasked with developing the detail of the Action Plan at a local level to reflect local circumstances and help deliver the Strategy. The resulting Action Plan was developed in conjunction with the Energy Saving Trust and adopted by Committee in June 2010. The plan deals with a two year time frame and will be reviewed and updated on an annual basis. Copies of these documents are available in Appendix 15.

It was intended that a Climate Change Officer be appointed who would be responsible for ensuring delivery of the plan, however this has been postponed for financial reasons. The responsibility for the delivery of the Action Plan has been divided up across the Council.

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Public realm policy E9:

11a) What is the meaning of “where appropriate” in the policy? How and where will this be defined?

The use of the term ‘where appropriate’ in the policy provides some flexibility. For example it may be that a particular development would not be required to contribute towards all the requirements (bullet points) set out in the policy, be this as part of the proposal itself or financial contributions, as there may be certain priorities in that location. The Council encourages pre-application discussions and each proposal would be considered on a site by site basis to ensure the benefits to the public realm are maximised.

The Council has begun to identify public realm improvements through the Infrastructure Delivery Plan and these will be further refined in the move towards the implementation of the Community Infrastructure Levy.

11b) How will the financial contributions to public realm improvements be assessed? Would the contributions comply with national policy? What is the situation regarding any Supplementary Planning Document?

Financial contributions will be assessed in accordance with the Council’s Developer Contributions Supplementary Planning Document (SPD). This was first adopted in June 2008 and is currently going through a partial review to improve its clarity and implementation and to ensure compliance with the Community Infrastructure Regulations. The Planning Policy Sub-Committee are considering proposed revisions to the SPD on 9 September and subject to the document being approved, public consultation will follow. The proposed revisions to the SPD can be found in Appendix 16.

The SPD sets a per person tariff which is then multiplied by the expected number of new occupants or workers generated by a proposal. This ensures that any contributions are ‘fairly and reasonably related in scale and kind to the proposed development’. Proposals are then considered on a site by site basis to identify whether there are any specific schemes within the catchment of the development on which the contributions would be spent. This ensures the process is in accordance with national policy.

11c) Should there be any reference to commercial viability in relation to developer contributions?

The Developer Contributions SPD clearly sets out the Council’s position in relation to commercial viability and therefore it is not considered necessary to repeat this in Policy E9. Reference to viability considerations can be found in section 1.8 (page 6) of the adopted SPD or section 7 (page 4) in the revised SPD (proposed).

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Improving accessibility and facilities for cyclists policy E10:

12) What is meant by “where appropriate?” How and where will this be defined? See also question 11.

The term ‘where appropriate’ provides flexibility as it may be that not all proposals can contribute towards the delivery of policy E10. This will be considered on a site by site basis.

Deliveries to premises policy E11:

13) Will it always be possible to provide rear servicing in new developments?

It may not always be possible to provide rear servicing in every development, although the Council is keen to achieve this where it can be delivered. Servicing premises from the highway is a cause of congestion in the Town Centre.

Town Centre parking policy E12:

14) How does any town centre parking strategy link to new development?

The Council continues to work Surrey County Council, acting as the local transport authority, in the preparation of the Local Transport Plan 3 (LTP3) and the associated Parking Strategy. The LTP3 Parking Strategy will offer guidance on appropriate standards for residential and commercial development, which is intended to assist the planning authority.

As general information, the County Council has requested that the Inspector notes the following:

“Surrey County Council is in the process of finalising a number of draft strategies, which together will make up Local Transport Plan 3. The intention is that this will be available for a 12 week consultation period from later this month (September 2010). A link to the webpage is below:

<http://www.surreycc.gov.uk/sccwebsite/sccwspages.nsf/LookupWebPagesByTITLE/RTF/Surrey+Transport+Plan+LTP3+-+have+your+say?opendocument>

The intention is that the LTP3 will be adopted by the County Council in February 2011. The life of LTP3 is until 2026, and it is probable that the strategies will be refined, adjusted and developed as circumstances dictate over this timeframe. The County Council believes that there is flexibility.

Key objectives of the LTP3 climate change strategy include: Increasing walking, cycling and public transport use and increase vehicle occupancy i.e. car sharing – this is consistent with putting alternatives in place which should help to limit the need for car growth.

Key objectives of the LTP3 congestion strategy include: Reducing delays for all modes of transport (car, bus and community transport, freight, pedestrians, cyclists)

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at congestion hotspots on Surrey's roads.

Key objectives of the parking strategy include: Reducing congestion caused by parked vehicle, manage on street parking space to make best use of the space available, enforce parking regulations fairly and efficiently, and provide appropriate parking where needed

The County Council believes that the objectives contained within the draft LTP3 are consistent with Plan E objectives 7-11."

What progress has been made with this since the implementation section indicates a start by 2010?

The parking strategy should be adopted in early 2011.

Will it contribute to limiting traffic growth?

The County Council has informed the Council, that by itself the Parking Strategy will not limit traffic growth. However, the wider measures contained within LTP3 should contribute to achieving this objective.

What is the rational for the allocation of specific numbers of car parking spaces on specific sites in the absence of a strategy?

Those Plan E policies that identify a specific number of parking spaces are not seeking to allocate new provision. Those policies are seeking to retain the current level of public parking provision in order to maintain the baseline level of public provision ahead of the strategy. The Council believes that this is a sound approach. The forthcoming Parking Strategy will seek to address the issue of displaced commuter parking (to adjoining residential areas) and optimise the use of public long stay provision. Consequently, the Council's approach of maintaining sufficient provision is considered to be compatible with the emerging Parking Strategy.

Changes to the road network policy E13:

15) Surrey County Council has said that town centre traffic is unlikely to reduce, what are the Council's views on this? What progress has been made with modelling traffic schemes?

Please also see answer to question 9 in main matter 1.

The Council acknowledge that it may be challenging to reduce traffic volumes in the Town Centre, although consider that this is a valid objective (objective 8) The objective is inline with Planning Policy Statement 4: Planning for Sustainable Economic Growth), which aims to promote the vitality and viability of Town Centres through delivering attractive and safe environments. Plan E must be realistic and deliverable, and the shift away from motorised traffic dominance is likely to be gradual. Therefore the approach will be incremental with delivery being through a variety of actions. It is also important that the approach is flexible, to take account of changing circumstances and opportunities that may arise over the plan period.

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Monitoring the impact of actions will be pivotal to assessing the impact of actions and identifying any additional opportunities.

Methods that could help reduce traffic volumes include the following examples. Providing alternative routes for traffic such as reverting South Street to two way could help reduce traffic volumes in parts of the Town Centre where congestion currently creates an unpleasant environment for pedestrians. In addition, making public transport more attractive (for example improvements to the station) and improving facilities for cyclists can help encourage people to use more sustainable methods of travel that could help reduce traffic volumes.

Initial option testing has been carried out by Surrey County Council. The delivery time frame for investigating changes to the highways network (such as restricting the left turn High Street (west) into Waterloo Road and the return of South Street to two way traffic), has been identified as being 2010 to 2015. The Council will continue to work with Surrey County Highways officers on this matter.

Management and promotion of Epsom:

16) Town centre manager – what is the likelihood of this position being funded by the Council or others? What progress has there been with this?

The Council continues to work on this aspect of Plan E in collaboration with its Local Strategic Partnership (LSP), and key stakeholders in the local retail and business community. The recently published document “The Way Forward – Strengthening the Future of Epsom Town Centre” (Appendix 3) provides evidence of support for this process and how it will be delivered.

The Council acknowledges that the recent recession and subsequent austerity measures introduced by the coalition government will have implications on the Council’s ability to bring forward this component of Plan E by itself. However, the Council has from the outset believed that any form of town centre management initiative has to be collaborative; actively involving the Council, LSP partners, and the local retail and business community. The LSP Economic Well-Being thematic group will lead on this matter.

Surrey Chamber of Commerce has also provided the following statement for the purposes of the Plan E examination hearing:

“The Business Partnership is a joint initiative between the business community in the borough and Epsom and Ewell Borough Council to facilitate a working dialogue between the Council and business people within the borough. Its role encompasses working with the retail and business community to improve the retail and commercial environment.

Over the past 18 months, The Business Partnership has taken a more central role within the restructured Local Strategic Partnership (LSP). The local LSP now follows the Surrey format of having five thematic groups and the Business Partnership leads on economic development and Chairs the Economic Well-being Thematic Group.

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The Business Partnership manages the Epsom Charter Market held every Thursday and Saturday throughout the year and has overall management of the Market Place in Epsom Town Centre. Non-market activities such as Independent's Day, Christmas Lights switch-on, Taste of Epsom, Bandstand Marathon etc are all co-ordinated by the Business Partnership.

The Business Partnership has also led on both the initial discussions around a possible Business Improvement District (BID) for Epsom Town Centre and the consultations producing The Way Forward – the report on strengthening the economic future of Epsom Town Centre produced by Shared Intelligence.”

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1) Depot Road and Upper High Street Policy E14:

1a) What is meant by a small – medium sized food store and should this be clarified?

PPS4 (annex B) defines Supermarkets as 'Self-service stores selling mainly food, with a trading floorspace less than 2,500 square metres, often with car parking.' It is therefore considered that a small- medium sized supermarket would be less than 2,500 square metres, and more likely 1,500- 2,000 square metres of retail floorspace.

1b) In view of the Tesco opposition to the size of store and mix of retail units, how will this be achieved?

The Council is the controlling land interest for most of the proposed allocation site. As such, the Council is in a useful position to ensure that the redevelopment of the site benefits Epsom Town Centre as a whole.

Whilst Tesco has a land interest at Upper High Street, their previous proposal from Tesco was dependant upon the release of Council owned land. The Council also note that proposed Policy E14 does not specify where within the site, the small-medium sized foodstore should be located. Whilst historic proposals have focussed upon locating a foodstore at the far end of Upper High Street, the release of a wider site provides an opportunity to identify other potential locations for the foodstore in relation to the wider Town Centre.

The Council notes that Tesco are not the only foodstore operator to express a serious interest in either Plan E or the redevelopment of this site. For example, the Council has received expressions of interest from Morrison's and Asda Stores Ltd in Epsom Town Centre.

The Council has been in pre-application discussion with Longmoore Investment Management about a comprehensive redevelopment scheme, incorporating housing and a foodstore, for the site. A letter from Longmoore is included as Appendix 17.

The Council is committed to the redevelopment of the site and are prepared to work with potential partners to deliver the Plan E policy objectives.

1c) What is the current position regarding the Tesco proposals?

The Tesco proposal was submitted in October 2009 and withdrawn in March 2010. The Council have recently become involved again in pre- application discussions with Tesco and their representatives.

1d) Are all the landowners on the site committed to redevelopment? What evidence demonstrates this?

This site is in multiple ownerships. The Council owns most of the site. A significant proportion of the Council's land was the subject of a recent planning application for a

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large supermarket which was withdrawn. Tesco own part of the site and are seeking its redevelopment.

The Council wants to see this large underused site in the Town Centre, brought forward for redevelopment which will assist in the regeneration of the Town Centre. Previous public consultation has taken place on this site, prior to Plan E. This has fed into the generation of the policy (Dialogue Report 2007 Document 15). Early work has commenced on the production of a development brief and it is anticipated that this will be completed within the next twelve months.

There are ongoing discussions between the Council, Surrey County Council and the Fire Service in relation to this part of the site. The replacement and/ or co-location of Epsom Fire Station will be subject to securing external funding. The need for an alternative site will be considered as part of the Delivery DPD. This could result in this part of the site coming forward at a later date, although this would not prevent other parts of the site from being redeveloped. The practicalities of this will be examined by the site development brief, which will take a comprehensive approach to the site's regeneration.

Planning permission (09/00958FUL Document 32) has recently been granted for the replacement of the United Reformed Church, which was identified as an infrastructure requirement of this site. There is significant planning history associated with the replacement of this place of worship, which the Council believes demonstrates a commitment towards delivery.

1e) How has the number of car parking spaces been arrived at for the site and does the provision comply with national policy?

Those Plan E policies that identify a specific number of parking spaces are not seeking to allocate new provision. Those policies are seeking to retain the current level of public parking provision in order to maintain the baseline level of public provision ahead of the strategy. The Council believes that this is a sound approach. The forthcoming Parking Strategy will seek to address the issue of displaced commuter parking (to adjoining residential areas) and optimise the use of public long stay provision. Consequently, the Council's approach of maintaining sufficient provision is considered to be compatible with the emerging Parking Strategy.

Should the new uses proposed for the site, such as the foodstore and small comparison retail units, seek the provision of dedicated off-street parking (as opposed to utilising existing public provision), then the Council will seek to apply an appropriate parking standard for the scale of development. See Main Matter 3 Question 4b.

1f) Has any assessment been made of the capacity of the site to accommodate all the uses identified in the policy and how will this site come forward?

Some indicative mapping has been carried out to ensure that the identified uses can be physically accommodated within the site, whilst complying with other relevant policies such as the Plan E height policy E7. This is attached in Appendix 18. The Council is satisfied that should the site come forward in its entirety, the quantities of

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development set out in policy E14 could be met. Should parts of the site fail to be delivered then the quantum achieved on the site could be less than that set out in the policy.

It is the Council's intention to produce a Development Brief for this site which will provide further detail regarding layout and phasing of the site.

1g) Is it realistic to provide an on-site decentralised heat and power generation source?

The Council believes that Town Centre sites, such as this, provide genuine opportunities for introducing decentralised energy sources to the Borough and a significant variety (and number) of potential users. The Council believes that this matter is best explored through the development brief process.

2)The Utilities Site Policy E15:

2a) Has the Council followed up the comments of Thames Water to see whether there is any possibility of release of their land within the plan period?

The Council notes the representation from Thames Water in relation to their land, which states:

“Thames Water does not object to the inclusion of the Water Treatment Works (WTW) within the opportunity site, however the Council should be aware that there are no plans to relocate the WTW, which is essential to the supply of water to Epsom. As well as the WTW there is also a crucial water extraction borehole on the site and again there are no plans to take this out of service. For these reasons it is unlikely that the WTW will be available for an alternative form of development in the foreseeable future.”

The Council has followed up these comments in a series of communications with Thames Water's Property Services Department. In its communication the Council noted:

“As we discussed, I appreciate that parts of the site remain important to Thames Water, being necessary for their operational requirements. However, I would ask that Thames Water note the planning history of the site, in particular that there have been two permissions (during the early 2000s) that sought to redevelop most of the site (with the exception of the bore hole at the rear of the site) for about 140 units. I would also add that the Council has undertaken some initial desk top work that suggests that those parts of the site currently underused (as scrub land and open storage) could come forward for redevelopment (as residential) separately from the active water resource infrastructure located closer to the East Street side of the site; which could be retained. The Council is committed to the regeneration of this site during the plan period and we would support in principle proposals that followed the emerging policy position.

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I would be very grateful if you could look into this matter further. I look forward to hearing from you."

Thames Water responded by stating:

"Thank you for your email. My current understanding is that Thames Water's land at East Street Water Treatment Works is required for operational purposes and is not available for redevelopment. I believe this is due to the need for there to be 'source protection zone' around the existing water abstraction boreholes on the site. I have been speaking to our Development Planning section about the planning history on this site, as the previous planning applications are before my time at Thames Water and I should be able to provide you with a more detailed / informative response, but it will take a while longer. Please feel free to contact me in the meantime if you wish to discuss this site."

The Council believes that the nature of the latest Thames Water response suggests that continued engagement may be productive.

2b) What evidence is there that the gas utilities infrastructure could be relocated?

A recent phone call between the Council and Andy Fraser, Property Development Manager, Scotia Gas has clarified the situation with regard to the gas utilities and the potential redevelopment of this part of the site. The following provides an overview of what was discussed:

The East Street site is currently used by Scotia Gas as an operational depot; a base to service equipment across the South East. Scotia Gas consider the site to be well located and it operates efficiently. It is mainly used for open storage, while some equipment is stored within storage units. All of the gas holders on the site are redundant and one has been removed. Due to the nature of the uses on site there is likely to be some level of contamination. The majority of the site is owned by Scotia Gas, while part is owned by National Grid Property.

Vacating the East Street site and decommissioning the gas holders does not feature in Scotia Gas' 3 year Capital Programme, however it is recognised that the site is within a Town Centre location with a high latent land value. While there is no pressing need for Scotia Gas to vacate the site (for example expiry of a lease) this is an incentive.

Should Scotia Gas vacate the site they would ideally wish to achieve both the following;

- a) Relocate their operational depot to another suitable location and
- b) Decommission the gas holders

There would be costs attached to each of these elements and as Scotia Gas is a public limited company, they cannot take on exceptional risks. However, it is acknowledged that economic conditions may become more favourable in the future resulting in improved viability. Mr Fraser also stated that over the next 15 to 20 years it is likely that all gas holders will be decommissioned as they are no longer required for operational purposes.

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It could be feasible that Scotia Gas vacate only part of the site through moving their operational depot to an alternative site. For this to occur, a new site of around 2 acres with a small industrial building for storing equipment would be required. The site would be utilised mostly for open storage. However, the business model is not fixed and Scotia Gas would be willing to explore other solutions to accommodate their business needs, working with the Council.

Mr Fraser considered having such a dialogue with the Council as positive and stated that Scotia Gas valued a proactive approach from the Council, which could help facilitate the site coming forward.

2c) Where are the gas pipelines?

2d) What impact does the location of these utilities have on the partial development of the site?

The Council has information, provided by Scotia Gas, on the location of gas pipelines across the Borough. Due to copyright issues this information cannot be made publically available, although the Council would be able to provide the Inspector with a map of the pipelines within the utilities site for her use.

The gas pipelines are located along the periphery of the site and therefore are not considered to pose any significant problems for redevelopment.

2e) Has any assessment been made of the capacity of the site to accommodate all of the uses identified in the policy and how will the totality of this site come forward?

Some initial block diagrams have been produced to ensure that the identified uses can be physically accommodated within the site, whilst complying with other relevant policies such as the Plan E height policy E7 (Appendix 9). The Council is satisfied that should the site come forward in its entirety, the quantities of development set out in policy E15 could be met. Should parts of the site fail to be delivered then the quantum achieved on the site could be less than that set out in the policy.

It is the Council's intention to produce a Development Brief for this site which will provide further details regarding layout and phasing of the site. Due to the nature of the site and its ownership, it is possible that the site will come forward in a piecemeal fashion. Production of the development Brief will therefore help to ensure a comprehensive approach whilst enabling this to happen. Working closely with the landowners will help to minimise the risk of parts of the site failing to come forward.

2f) Is it possible that some parts of the site will be more deliverable than others and what will the Council do in the event that partial proposals are submitted rather than a comprehensive scheme that would deliver all of the development?

Yes. It is acknowledged that some parts of the site will be more deliverable than others resulting in parts of the site being developed ahead of others. This may even be necessary to help fund the development of other parts of the site. The

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Development Brief will consider such issues and allow for this while ensuring continuity and linkages across the site. Should parts of the site come forward prior to the Development Brief, the Council will seek to ensure the proposals do not compromise the development of the remainder of the site and the delivery of policy E15.

The Council has undertaken some initial work towards the production of a site development brief. This work identifies that the successful engagement of local landowners and key stakeholders is critical to the success of the development brief and subsequent stages of the site's regeneration. The formation of a landowner interest group, as a component of the development brief process, could help provide them with greater and secure their interest in the delivery of the site.

2g) The site was subject to previous allocations in the Local Plan but most has not been redeveloped. Does this indicate that most of the site is not deliverable?

No, the Council does not believe that it does. Since the adoption of the Local Plan (2000) the Rainbow Leisure Centre has been redeveloped. Planning permission has also been granted for the redevelopment of the Linton's Centre. However, parts of the site remain undeveloped. Thames Water did secure planning permission for residential development on their land which lapsed in 2005. While Thames Water has indicated in their representation that there are no current plans to relocate the water treatment works it is possible that this situation may change over the next 16 years.

Both the Scotia Gas and the Thames Water sites are under utilised. It is likely that in this age of austerity these public companies will be under pressure to optimise their property assets. Improving property markets may aid the release of these sites so both organisations may seek to make the most efficient use of their resources.

The Council acknowledges that the remainder of the site is the most challenging part to deliver, although being a long term plan and with the Council being more proactive in seeking redevelopment on this site (for example the intention to produce a Development Brief and seeking to allocate an alternative site for the relocation of the gas site if required) it is considered that during the plan period these parts of the site either partially or in totality could be redeveloped.

2h) Is it realistic to provide an on site decentralised heat and power generation source?

The Council believes that Town Centre sites, such as this, provide genuine opportunities for introducing decentralised energy sources to the Borough and a significant variety (and number) of potential users. The Council believes that this matter is best explored through the development brief process.

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3)The Station Site Policy E16:

3a) How can the retention of 27 car parking spaces adhere to a unified Town Centre parking management strategy when that is yet to be formulated?

The Council considers the retention of 27 public parking spaces allocated for rail users is in line with the parking provision being provided in the new development. It maintains the baseline position.

The recent planning application for the redevelopment of the Station included a transport study. This was assessed by the transport authority who is also preparing the Parking Strategy. The County Council did not raise an objection to the retention of the existing level of parking provision.

3b) If development accords with planning permission already granted, is Para 5.34 correct?

“The level of parking provision will be directly linked to the site’s travel plan and the Town Centre Parking Strategy”

The Council believes that the extant planning permission for the Station Site is in accordance with the above extract from Paragraph 5.34.

“The parking management and charging regime will be in line with the approach applied across the whole of the town centre”

Whilst the Council believes that maintaining the existing level of public parking provision is compatible with the emerging Parking Strategy, the need to determine the Station site application ahead of a unified Town Centre charging regime means that the permission is not in accordance with the final part of Paragraph 5.34. Should the Inspector identify this part of the paragraph as unsound, the Council would be agreeable to its deletion.

3c) Is it realistic to provide an on-site decentralised heat and power generation source?

The Council believes that Town Centre sites, such as this, provide genuine opportunities for introducing decentralised energy sources to the Borough and a significant variety (and number) of potential users.

3d) Is that part of the scheme granted planning permission?

No. The Council was able to negotiate a biofuels heating system for the site.

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4) Other Opportunity Sites Policy E17:

4a) Are the site boundaries as defined on the proposals map correct?

Yes.

4b) What parking standards will be used in calculating provision on these sites?

The Council's saved local plan includes a maximum parking standards for new developments under Policy MV8. However, this policy approach has not proved entirely effective. Consequently, the Council has worked closely with the transport authority to determine appropriate parking standards for new development proposals in line with national policies contained within PPG13, PPS4 and the previous version of PPS3.

In order to provide greater clarity the transport authority is currently developing new parking standards as part of the Local Transport Plan 3 process. The transport authority has supplied the Council with three documents for the purposes of the Plan E examination hearing. These are attached in Appendix 19. The Council understands that these new standards will initially serve as guidance to local planning authorities. However, the Council anticipates that these standards will be considered as part of the emerging Delivery DPD (the Council's site allocations and development management policies development plan document). The current timetable for the Delivery DPD envisages further engagement on development management policy options in the first quarter of 2011. The Council envisages the adoption of the DPD during 2013.

4c) Is there an indication that any of these schemes will go ahead?

Market Place, High Street

The Council is already working closely with the local business community (through its Local Strategic and Business Partnerships) and the County Council (acting as the local highway authority) to implement the planned for improvements. These are set out within Plan E's Implementation Plan and Infrastructure Delivery Plan.

Former Woolworth's Store, High Street

Since the closure of the Woolworth's department store the site has been let to a number of budget retailers. It was recently the subject of a shop unit refurbishment and now houses the retailer Poundland. The Council has been in contact with the property's landowner and a number of pre-application discussions have taken place. These discussions explored how the landowner could redevelop the site to meet Plan E's objectives. The Council intends to continue to work with the local business community and the shop's landowner to secure the types of use on this site to meet Plan E's objectives. The Council believes that the introduction of a town centre management regime will be instrumental in delivering the objectives on this site; for example, by promoting of the Town to attract a higher quality retail use onto the site, and others.

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Pickard House

This site has been the subject of significant pre-application discussion with the landowner. Recent discussions have been extremely positive and the Council is confident that a scheme that meets the policy objectives set out within Plan E can be delivered within the first five year phasing tranche.

Former Magistrate's and County Court site, The Parade/ Ashley Road

This site has recent planning history (08/00409FUL and 10/00071FUL- Document 32), which seeks to redevelop the site for a mixed-use scheme comprised of 46 residential units and a medical facility on the ground floor. This developer has delivered other housing schemes, most notably Capital Square, within Epsom Town Centre. The most recent proposal complies with Plan E in terms of height and mix of uses.

Global House, Ashley Avenue

This is an existing commercial office use located to the rear of the Ashley Centre, facing the cluster of employment uses found along Ashley Avenue. This site is an important component in the Town Centre's employment floorspace portfolio. Whereas some of the Town Centre's office floorspace particularly that located on the upper floors above retail units may not be entirely fit-for-purpose, this site retains great potential. It positively contributes to the wider mix of commercial retail, leisure and community uses focused around the Ashley Centre.

The Council continues to work with the owners of the Ashley Centre, who also own Global House, to ensure that this site is retained in employment use.

TK Maxx Store, High Street

This is a prominent site within the Old Town/ Market Place area of the Town Centre. It is home to an existing retail use – TK Maxx, which sells a range of comparison goods. However, the site has been identified by the Epsom Town Centre Conservation Area Appraisal (Document 17) as having a neutral impact on the townscape. The Appraisal suggests that the existing building could be replaced by a more positive building in the future.

The redevelopment of the site offers a good opportunity to improve the character and appearance of this part of the Town Centre. Whilst it would be possible to retain the existing building, the Council will work with the local business community and the shop's landowner to secure the redevelopment of this site to meet Plan E's objectives. The introduction of a town centre management regime will help deliver the objectives on this site.

Emergency Services Uses, Church Street

The Council continues to work with the emergency services and the County Council who occupy this site through its Local Strategic Partnership. The necessity to provide better value services will inform the asset decisions relating to these sites. The Council has already had a number of discussions with the County Council and the Fire Service about the continued use of their site and the possibilities of co-locating with another compatible use (such as the Ambulance Service). There are also on-going corporate level discussions examining the potential co-location of Police Services with other community/ civic uses (such as the Borough Council). This process is closely related to a wider County-wide asset and infrastructure review. These actions evidence that the emergency services sites will become

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available for redevelopment, with the existing uses either relocating to new locations (including co-location) or re-provided in a more intense form on site.

The Comrade's Club, The Parade

This site has recent planning history (08/01453FUL Document 32) and was the subject of a proposal that sought redevelopment for a mix of uses comprised of a hotel and replacement club facilities

Recently there have been a number of schemes proposing the development of hotels within the Town Centre. The Council understands that this follows a national trend and may be partially due to the availability of finance for this type of development scheme. Whilst there are two existing hotel chains operating within the Epsom area (at the Epsom Downs Race Course and on the Dorking Road), there is no evidence to suggest that the market is operating at capacity. Anecdotal evidence suggests that outer-London locations with good rail connectivity, such as Epsom, are popular and cost-effective alternatives for business travellers. It is understood that the hotel sector is buoyant and that a number of hotel chains are anticipating growth. The Town Centre is the most appropriate location for this type of use.

Land to the Rear of the Albion Public House, South Street

This opportunity site was identified as a potential source of mixed-use housing by the Council's Strategic Housing Land Availability Assessment (SHLAA). Whilst the site has no recent planning history and the Council is unaware of any landowner aspirations for its future, it is considered appropriate for allocation within Plan E. This backland site is underused and the Council believes that it provides a clear opportunity to contribute towards the improvement of the vitality and viability of the western part of the Town Centre.

The Council intends to work with the local business community and the site's landowners to secure the types of use that will meet Plan E's objectives. The Council believes that the allocation of this site will help to raise its profile and identify its potential for regeneration. The Council has accordingly placed the delivery of this site in the latter tranche of the Plan E period.

Town Hall Square and car park, rear of the Town Hall

This opportunity site is one of a handful of sites that are in public ownership and where the redevelopment potential is as focused towards public realm enhancements, as it is towards maintaining the Town Centre's economic vitality and viability.

The Council is already working with the local business community (through its Local Strategic and Business Partnerships) to implement the planned improvements. These are set out within Plan E's Implementation Plan and Infrastructure Delivery Plan. The public realm improvements made to the alleyway linking this site to the High Street East serve as an example of how this allocation will be implemented – notably, how the Council worked with a landowner to finance and implement these public realm improvements. The Council is exploring how it can work with neighbouring landowners to deliver Plan E's objectives for this site.

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4d) Should residential uses include student housing or institutional uses?

Yes, the Council acknowledges that proposals for specialist residential accommodation, including residential uses related to healthcare and education uses, could be acceptable on some of the sites specified under Policy E17. However, the Council believes that the proposed policy approach, which identifies those sites where residential uses are appropriate, is sound. The Council considers this a sound approach as it provides sufficient flexibility, over the longer plan period, to take account of any changes in demand.

General Points

The Council should provide a comprehensive list of responses to representations made and any changes and errata proposed in response. The Council should also keep a list of any changes proposed as the Examination progresses.

The Council has responded to all the representations made throughout the Regulation 25 stage of consultation. This has been provided as part of the Consultation Statement (supporting document G2). The council has not responded to the representations made on the Plan E Proposed Submission Document.