

Sustainability Appraisal Report
Epsom Town Centre Area Action Plan (Plan E)
January 2010

1 BACKGROUND

1.1 Sustainable development

1.1.1 Sustainable development first moved into mainstream policy making and legislation after the Rio Earth summit in 1992, having emerged as a key issue in 1987, highlighted by Bruntland. Following the Rio Earth Summit, the UK government produced their first strategy for sustainable development in the UK'. Subsequently, in March 2005, a second UK framework for sustainable development 'Securing the Future' was launched. Five principles of sustainable development are identified:

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

1.1.2 An essential consideration when drawing up planning documents is, therefore, their effect on the environment and people's quality of life, both now and in the future. To help address this, sustainability appraisal is carried out alongside the preparation of plans to ensure social, environmental and economic issues are taken into account at every stage.

1.1.3 Appraisal is conducted in line with Government guidance, 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' (ODPM, 2005). This Sustainability Appraisal Report sets out how the guidelines have been followed by providing a summary of the process including:

- identifying the scope for appraisal
- undertaking an appraisal of issues and options
- producing an SAR

1.1.4 This document forms the Sustainability Appraisal Report (SAR) for the Epsom Town Centre Area Action Plan (Plan E). It details how sustainability appraisal has informed the preparation of the plan and is published to support the submission PLAN E. In conforming with the ODPM guidance, the SAR meets the provisions of the SEA Directive which requires an Environmental Report¹.

1.2 Local Development Framework

1.2.1 The Epsom and Ewell Local Development Framework (LDF) comprises a number of individual documents (Local Development Documents) that together guide the future development of the Borough. The Local Development Scheme (LDS) is a three year project plan, prepared by the Council, which outlines every

¹ PPS12, paragraph 4.40, indicates that sustainability appraisal meets the requirements of the SEA Directive (EU 2001/42) on the environmental assessment of plans

LDD that the Council intends to produce over the next three years, along with timetables for their preparation. LDDs can take three forms:

- Development Plan Documents (DPDs), which set out policies and proposals for the whole Borough and are subject to external examination;
- Area Action Plans, which set out policies and proposals for a defined area of the Borough and are subject to external examination;
- Supplementary Planning Documents (SPDs), which provide additional information to explain policies and proposals in more detail to assist in the preparation of planning applications.

1.2.2 The Council has in place an adopted Core Strategy DPD (2007), which sets out the vision and broad strategy for accommodating growth together with key policies to manage development; and a Developer Contributions SPD (2008), which sets out the approach of the Council with respect to the level of contributions required for affordable housing and infrastructure to support new development. In addition to the Epsom and Ewell Plan E the Council is also in the process of producing a Delivery DPD that will identify specific sites for housing, employment and other key uses and will provide detailed policies designed to secure the proper management of development.

1.2.3 A Statement of Community Involvement (SCI) has also been prepared. It sets out how the Council will engage with the community in the preparation of LDDs.

1.2.4 Further Supplementary Planning Guidance is available for infill development, household design and a development brief for the West Park area. These documents provide useful guidance, but have not been the subject of sustainability appraisal since they predate the requirement to do so.

1.2.5 The Plan E will be in accordance with and support other LDDs. In particular, it will relate to policies in the Core Strategy DPD and the higher level South East Plan.

1.3 Higher level plans

1.3.1 The South East Plan provides a higher level development strategy that sets out proposals and policies for the South East region. The SE Plan was adopted in 2009 and was the subject of sustainability appraisal. Epsom and Ewell Borough falls within the 'London Fringe' sub region described in the plan and the appraisal comments that are reported in the SE Plan Sustainability Appraisal Report have informed the preparation of the Epsom and Ewell Core Strategy DPD and the accompanying Core Strategy DPD SAR.

1.3.2 The Core Strategy contained a policy specifically on Epsom Town Centre and which was subject to sustainability appraisal. The appraisal findings help to identify the key issues for further consideration in appraisal of Plan E.

1.3.3 Options for the town centre are considered at paragraph 4.2.6 of the submission Core Strategy SAR.

Preferred Option (Objective 22): *Maintain and encourage a suitable mix of uses in Epsom Town Centre*

Alternative Option (Objective 22): *Allow the market to direct uses within the town centre*

- 1.3.4 Appraisal reports that the preferred option would help deliver sustainability objectives helping to create vibrant communities. Whilst the alternative option was found to have some positive aspects it was considered that it may lead to an imbalance of uses that would not support sustainable growth. The need to safeguard and promote retail facilities was also appraised and found to strongly support the objectives of meeting the needs of residents by retaining services in the most accessible part of the Borough.

Habitats Regulations Assessment

- 1.3.5 Regulation 48 of the Habitats Regulations 1994 requires that proposals are considered in the context of Article 6 of the Habitats Directive (92/43/EC). This stipulates that development which is likely to have an adverse impact on a Natura 2000 site may only proceed once it has been established that it is in the public interest and that appropriate mitigation and compensation measures have been approved by Natural England.
- 1.3.6 As part of the development of the Core Strategy, the Council carried out a Screening Assessment to assess whether there would be any significant effects on protected European sites. Although there are no designated Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) within the Borough, there are two SACs which are within 5km from the Borough's boundary. A variety of issues were considered including increased urbanisation, tourism, and air pollution. It was found that the Core Strategy would not have a significant adverse affect on these SACs. The Appropriate Assessment for the Core Strategy is available on the Council's website.
- 1.3.7 Plan E is focused on the Borough's main Town Centre, Epsom and the nearest European site is over 5 km away. Plan E is being produced in accordance with the Core Strategy and therefore is unlikely to lead to any significant effects on the protected European sites.
- 1.3.8 In addition, planning applications submitted in the context of Plan E will need to demonstrate that the potential impact on Natura 2000 sites has been addressed in full.

1.4 Epsom Town Centre Plan E

- 1.4.1 Plan E is the primary means of delivering Core Strategy DPD Policy CS14 which seeks to improve Epsom town centre, by supporting it in adapting to and reinforcing its role in meeting the needs of the local community and acting as a focus for a range of activities including retail, cultural, business, leisure and

residential. The vision of the town centre is for a strong and distinctive character. Production of Plan E is an essential component in meeting the requirements of PPS1 to bring forward sufficient land of a suitable quantity in appropriate locations to meet the expected needs for housing, industrial, retail and commercial development, and for leisure and recreation.

1.4.2 Plan E will identify sites and appropriate timing, phasing and delivery mechanisms to meet housing targets set in the South East Plan. It will make provision for employment, retail, mixed use and other key infrastructure as required; and set a framework, in conjunction with the Core Strategy DPD and Contributions SPD, that will support the achievement of the following objectives:

- creating a diversity, richness and balance of uses which will contribute to a flourishing day-time and night-time economy, help satisfy community needs and enhance environmental quality/sustainability;
- ensuring development recognises and builds on the distinctive character of Epsom town centre and contributes to conserving and developing a “sense of place”;
- improving the pedestrian and cyclist environments by creating new links and developing a street network which is designed with their needs in mind, and reduces the adverse impact of traffic;
- a clear spatial structure for future growth and change; and
- developing a greater sense of safety and security for users, and improving the perception of the town as active, inclusive and safe.

1.4.3 Plan E will be subject to an independent examination and will be a material consideration as part of the development plan as defined by Section 38 (6) of the Planning and Compulsory Purchase Act (2004).

1.4.4 The DPD will be in general conformity with national planning guidance/statements and regional planning policy. It will demonstrate its compliance with the Core Strategy DPD and it will conform with the Sustainable Community Strategy. Sustainability appraisal helps in this respect by identifying the provisions of other plans that apply to Plan E (see below and Appendix A).

1.5 Stages of Sustainability Appraisal

1.5.1 Government guidance on SA identifies the various stages of SA and how these relate to the different stages of preparing an LDD such as the Plan E. The stages are shown in Table 1, below, which is taken from the ODPM guidance ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks’ (2005).

Table 1

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

<ul style="list-style-type: none"> • A1: Identifying other relevant policies, plans and programmes, and environmental objectives • A2: Collecting information on environmental, social and economic conditions in the Borough • A3: Identifying environmental issues and problems • A4: Developing the framework for sustainability appraisal • A5: Consulting on the scope of the sustainability appraisal
<p>Stage B: Developing and refining alternatives and assessing effects</p>
<ul style="list-style-type: none"> • B1: Testing the plan objectives against sustainability objectives • B2: Developing the alternative options • B3: Predicting the effects of the draft plan • B4: Evaluating the effects of the draft plan • B5: Considering ways of mitigating adverse effects and maximising beneficial effects • B6: Proposing measures to monitor the significant environmental effects of plan implementation
<p>Stage C: Preparing the Sustainability Appraisal Report</p>
<p>C1: Preparing the Sustainability Appraisal Report</p>
<p>Stage D: Consulting on the draft plan and Sustainability Appraisal Report and examination of the final plan</p>
<ul style="list-style-type: none"> • D1: Public participation • D2i): Assessing significant changes prior to the final plan • D2ii): SAR to support submission of the final plan • D3: Making decisions and providing information
<p>Stage E: Monitoring the significant effects of implementing the Plan</p>
<ul style="list-style-type: none"> • E1: Finalising aims and methods for monitoring • E2: Responding to adverse effects

2 DEVELOPING THE SCOPE AND METHODOLOGY OF APPRAISAL

2.1 General process

2.1.1 Appraisal of the Plan E is in accordance with this guidance. The process of appraisal is described below.

2.2 Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

2.2.1 The appraisal process started formally with the production of a Scoping Report in 2005 for the Local Development Framework it set out:

- other relevant policies, plans and programmes that influence the plan
- environmental, social and economic information (baseline)
- sustainability issues and problems
- a framework and methodology for undertaking SA

2.2.2 Comments received during a consultation period in the scope of SA were taken into account in producing the Core Strategy DPD SAR and this has, in turn, informed the appraisal of Plan E.

2.2.3 A full account of the consideration of other plans is included as Appendix A and the full details of the baseline are provided as Appendix B to this SAR. Where appropriate, reference is made to this information in the report of the appraisal findings which is set out in Section 3 of this report.

2.2.4 In addition to the baseline, the following documents that are part of the LDF evidence base have also informed appraisal:

- Strategic Housing Land Availability Assessment 2009
- Strategic Flood Risk Assessment 2008
- Retail and Town Centre Health Check 2009
- Retail Study 2007
- Environmental Character Study 2008
- Strategic Housing Market Assessment 2008
- Housing Needs Study (update) 2006
- Employment Land Review 2006
- Open Space Audit 2006
- Surrey Housing Potential Study 2005
- Characterisation of the Area Study 2005

2.2.5 Due to the time elapsing between the publication of the original Scoping Report and the preparation of the submission Plan E, the Council undertook a supplementary scoping exercise to clarify the scope of appraisal with the Consultation Bodies². This entailed a formal request to verify what they considered to be the key issues affecting the town centre. The comments received have been incorporated into this SAR and are reproduced as Appendix C of the report.

2.3 Stage B: Developing and refining options and assessing effects

² Natural England, the Environment Agency and English Heritage

2.3.1 Options for achieving the objectives of the plan were tested against the sustainability appraisal framework (see Table 2) that was established through scoping. This early appraisal predicted and evaluated impacts of the options and informed the development of the plan. Ways of mitigating adverse effects and maximising beneficial effects for the preferred options were also considered. This process is described in more detail in Section 3.2 and Section 3.3 of this SAR.

2.4 Stage C: Preparing the Sustainability Appraisal Report and Stage D: Consulting on the draft plan and Sustainability Appraisal Report

2.4.1 This Sustainability Appraisal Report has been produced to support the consultation on Plan E and subsequent submission to the Secretary of State. The consultation will run for 6 weeks and any representations made on the document will be passed to the Secretary of State for consideration as part of the Examination in Public.

2.5 Stage E: Monitoring the significant effects of implementation of the plan

2.5.1 Following consideration of the plan by the Secretary of State Plan E will be adopted if found to be sound. The indicators established through the sustainability appraisal process will be used to help monitor the effects of the implementation of the plan.

2.6 Joint Working

2.6.1 The Council has conducted the sustainability appraisal process in collaboration with four other East Surrey authorities³. The five authorities have signed a service level agreement to demonstrate their commitment to this process. Joint working commenced at the early stages of the production of the Scoping Report and continues to be a valuable tool for providing an independent and objective overview for the appraisal of Local Development Documents.

2.6.2 The process has proceeded through the stages described above. The appraisal sessions(Stage B) have involved congregating a group of 'appraisers':

- a Planning Officer from Epsom and Ewell Borough Council;
- a representative from an adjacent authority;
- a representative from a non-adjacent authority; and
- an independent sustainability consultant

³ The 'peer review' group consists of the following authorities: Epsom and Ewell BC, Tandridge BC, Reigate and Banstead BC, Mole Valley BC and Elmbridge BC.

3 APPRAISAL OF PLAN E

3.1 Initial appraisal

- 3.1.1 The Plan E builds on a commitment in the Core Strategy DPD which identifies a need to protect and enhance the vitality of Epsom Town Centre. Sustainability appraisal of the Core Strategy identified that higher density residential development and a mix of uses was appropriate in town centres to maximise the benefits of good accessibility and to provide the basis for the delivery of a more sustainable community through decentralised energy and improved public transport. A market led approach to managing the town centre was not preferred since there would be little certainty that the right balance of development would be provided and there would be little chance of co-ordinating the delivery of benefits. Appraisal was primarily concerned with strategic matters.
- 3.1.2 An Issues and Options Paper was published for consultation in April 2009 and this gave consideration to detailed matters. Appraisal was undertaken of different options for delivering development in the town centre and different criteria for ensuring proposals and actions would meet the objectives of sustainable development. The 'Initial Sustainability Appraisal Report' was published at the same time and identified key points as:
- addressing climate change, including flood risk
 - delivering balanced growth that maintains and enhances the role of the town centre
 - using previously developed land effectively whilst delivering an attractive and safe environment
 - improving public transport and access for pedestrians and cyclists
 - improving air quality
 - maintaining and enhancing heritage interests

Appraisal of Plan E Town Centre Area Visions

- 3.1.3 The town centre visions establish the principle aims for key areas as identified in the proceeding text. The individual visions respond well to the issues arising in the initial appraisal. Whilst further appraisal is not strictly necessary, in the interests of ensuring a comprehensive and robust sustainability appraisal process, these visions have been considered against the sustainability appraisal objectives to formally note the sustainability attributes.
- 3.1.3 The vision for the Old Town and Market Place seeks to support a vibrant economy through improvements to the town centre. Preserving and enhancing the historic character in a safe and attractive environment are key aims and with improved access on foot, cycle and by public transport the vision is considered to strongly support sustainability objectives. The vision does not expressly describe how key measures, such as renewable energy, will be delivered since it is appropriate to rely on other policies in Plan E, Core Strategy DPD and on area

specific proposals to provide the means for ensuring these sustainability objectives can be met.

- 3.1.4 The vision for High Street (East) is a key part of the wider strategy to stimulate retail mix and vibrancy and create a flexible public space away from traffic. Preserving and enhancing the historic character in a safe and attractive environment are key aims alongside improved pedestrian movement. Some issues, such as renewable energy are not directly addressed and this was an issue identified in the initial appraisal in April. It is appropriate, however, to rely on other policies in Plan E, the Core Strategy DPD and on area specific proposals to ensure these sustainability objectives can be met.
- 3.1.5 The vision for Upper High Street/Upper Town seeks to stimulate retail mix whilst preserving and enhancing the historic character in a safe and attractive environment and identifies a major opportunity for renewable energy. Some issues, such as housing, are not directly addressed and this was an issue identified in the initial appraisal in April. It is appropriate, however, to rely on other policies in Plan E and Core Strategy DPD and on area specific proposals to ensure these sustainability objectives can be met.
- 3.1.6 The vision for the Ashley Centre and Ashley Avenue is a key part of the wider strategy to retain retail mix and employment use and provide an improved pedestrian link to the remainder of the town.
- 3.1.7 The vision for East Street seeks to deliver a mix of retail mix and office use and provide improved pedestrian and cycle link to the remainder of the town.
- 3.1.8 The vision for Epsom Railway Station and Station Approach focuses on improved rail facilities and the provision of mixed development including housing. Improved rail facilities and pedestrian links would strongly support sustainable transport and access to services for all.
- 3.1.9 In combination the vision for the town centre strongly supports sustainability through the maintenance and enhancement of its role as a secondary regional centre. It would use previously developed land effectively, thus reducing the need for green field sites outside the town centre and provide a strong basis for improved public transport, renewable energy and a green and attractive environment.

Supplementary scoping

- 3.1.10 The Council undertook a second, specific consultation to verify the scope of sustainability appraisal for Plan E in 2009. This entailed a formal request to the Consultation Bodies to verify what they considered to be the key issues affecting the town centre. The responses received have been incorporated into this SAR and are summarised as Appendix C to this Report.
- 2.3.1 The key issues on which appraisal focuses have been established through the Scoping Report, consultation and initial appraisal and include the findings of appraisal of the Core Strategy DPD. The key issues are set out in Table 2, below.

Table 2 Summary of key issues affecting the town centre in relation to the sustainability objectives

Sustainability objective	Key issues
1) To minimise the harm from flooding	<p>There are no watercourses in Epsom town centre although a significant surface water flow path runs south to north through the town centre. The SFRA classifies part of the town centre as being in a 'Critical Drainage Area'. This means it is within flood zone 1, but has a potential for pluvial and groundwater flooding which is currently unknown. The area may be susceptible to flooding from overland flow and surcharging sewers and drains. Climate change predictions emphasise the importance of ensuring this risk is not increased. The Environment Agency should be consulted to ensure data is up to date.</p> <p>Flooding has occurred from the foul sewer in the Town Centre area.</p>
2) To reduce land contamination and safeguard soil quality and quantity	The town centre area has no agricultural land that could be lost to development. There are no known sites which are contaminated, although there are a number which have been identified as having potential contamination.
3) To ensure air quality continues to improve	Recent diffusion monitoring at three locations in the town centre indicate that the national guidelines for nitrogen dioxide are being exceeded. A detailed assessment will be carried out over the next 6 months, the results of which may result in an Air Quality Management Area (AQMA) being declared.
4) To reduce greenhouse gases	Measures are required to reduce greenhouse gas emissions.
5) To reduce noise pollution	Standard planning regulations and the use of conditions on planning permissions mean that significant impacts are likely to be avoided. The plan should, however, seek to avoid the incidence of incompatible uses being located in close proximity.
5) To reduce light pollution	Standard planning regulations and the use of conditions on planning permissions mean that significant impacts are likely to be avoided. The plan should, however, seek to avoid the incidence of incompatible uses being located in close proximity.
7) To maintain and improve the water quality of the rivers and groundwater	Standard planning regulations and the use of conditions on planning permissions mean that significant impacts are likely to be avoided. The plan should, however, seek a high standard of control of water quality. Epsom town centre is underlain by a Major Aquifer and the majority of the town centre falls within an Inner Source Protection Zone.

8) To conserve and enhance biodiversity within the plan area	There are no designated habitats in the town centre. Opportunities should be identified to improve urban biodiversity. Green infrastructure within the town centre is limited and there are certain areas which are identified in the Open Space Audit as being deficient.
9) Provide for employment opportunities	The recent trend has been for an increase in out commuting. An improvement in the stock of office space in the town centre may provide more local employment choices which can be accessed by public transport, cycling and walking and help boost the local economy. There have been relatively few commercial developments in Epsom town centre over the past few years.
10) Make land available to meet the needs of the economy	Whilst there appears to be sufficient employment land in the Borough, the stock is limited. The office stock that is available is generally 2nd grade / lower quality and could benefit from improvement.
11) Support economic growth which is inclusive, innovative and sustainable	A planned, holistic approach is essential to delivering sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	Opportunities exist for a mix of uses on individual sites and on neighbouring sites.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	3,980 additional housing units are required within the Borough by 2026. Core Strategy Policy CS14 encourages residential use in the town centre but sites to accommodate this requirement are limited. It is important to achieve a balance of housing in relation to other town centre uses. The need for affordable housing is significant.
14) To facilitate the improved health and wellbeing of the whole population	Parks adjacent to the town centre provide good access to open space, although there are areas of the town centre which are deficient in open space. The Environment Agency identifies the area as one of serious water stress. Water efficiency measures are of high priority.
15) To reduce poverty and social exclusion	As the most easily accessible location in the Borough to most of the population, the town centre is a desirable location for the provision of community facilities.
16) To create and maintain safer and more secure communities	Core Strategy Policy CS14 seeks to ensure the creation of a vibrant community throughout the day and night improves informal policing. However, night time economy may create problems. Safety can be addressed through design criteria and guidance and a holistic approach to the use of public spaces.

17) To improve accessibility to all services and facilities	Epsom is ranked as a 2nd tier town & needs to maintain its position in the retail hierarchy. A Retail Study on Epsom town centre has identified only a limited need for additional retail, stating the focus should be on improving that quality of the existing retail mix. Core Strategy Policy CS14 strongly supports opportunities to access employment, services, facilities and cultural activities and improve social inclusion.
18) To make the best use of previously developed land and existing buildings	Higher densities can be achieved in sustainable town centre locations, but if sites cannot be found in the urban areas, then green belt may have to be released. The plan can seek to maximise the use of previously developed land by identifying where high density development may be appropriate. There is currently a restriction on building heights which can reduce densities.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	Heritage interests in the town centre can be identified and protected (a Conservation Area Appraisal has been conducted). Enhancement of heritage can have a positive impact on the character and attractiveness. Both designated and non designated heritage can contribute to local character.
20) To reduce road congestion and the need to travel	Epsom is well served by public transport. It has a number of car parks throughout the town centre. A main A road also runs through the centre of the town. Traffic congestion is often cited as a negative aspect of the town centre
21) To ensure that the District is prepared for the impacts of climate change	Core Strategy Policy CS14 seeks to promote mixed use. This can help reduce need to travel to the town centre, support public transport, increase potential for CHP and support the provision of renewable energy capacity. The comments at SA Objective 1 are also relevant.
22) To increase energy efficiency of new and existing development	In addition to the comments in SA Objective 21, redevelopment offers and opportunity to improve the energy efficiency of town centre buildings. Water efficiency measures (see SA Objective 14) will have a secondary benefit of improving energy efficiency.
23) To increase the production and use of renewable energy	Core Strategy Policy CS14 seeks to promote mixed use. This supports the provision of renewable energy capacity.

3.2 Appraisal of submission Plan E: Policies

- 3.2.1 A final appraisal of the Epsom Town Centre Plan E policies was undertaken following the drafting of a submission Plan E. The appraisal was undertaken by an independent consultant and the findings were further analysed by a peer review group.

- 3.2.2 SA is primarily interested in strategic issues, but there is inevitably some discussion of project level impacts since these can have implications with respect to strategic choices, particularly when considered cumulatively.

Overview

- 3.2.3 Policies in Plan E work together with each other and with policies in other LDDs to support the delivery of sustainability objectives. Policy E8, for example, encourages renewable energy; Policy CS3 of the Core Strategy DPD ensures biodiversity and flooding issues will be addressed and that amenity is protected; and Policy CS6 of the Core Strategy DPD encourages sustainable design. Site specific proposals in Plan E provide a further steer for developers by flagging key sustainability measures relating to the respective area.
- 3.2.4 Whilst the LDF can be demonstrated, therefore, to work strongly towards sustainability, appraisal of Plan E has identified that an overarching statement or commitment to a climate change/energy strategy may strengthen the position and likelihood of delivery of sustainable development. This can be explored in the Delivery DPD and in the corporate Climate Change Strategy. The issues covered should include flooding, energy and green infrastructure through measures such as an increased provision of shaded open space which would be beneficial during periods of extreme hot weather and / or to build in flood attenuation capacity in the event of flash flooding. Water efficiency measures are of high priority due to the position as an area of serious water stress. This, combined with SUDS⁴ (where appropriate) will have a secondary benefit of improving energy efficiency and protecting groundwater at this sensitive location. Of particular note, the Environment Agency advises that flooding from foul water has previously occurred in the Epsom Town Centre area.
- 3.2.5 The Environment Agency regularly provides up dated information with respect to flood information and will be consulted as a matter of course to ensure proposals are appropriate. The London CAMS, 'Water Management Unit 5 – Hogsmill' provides detailed information that will inform subsequent planning applications.

Policy E1: Town centre boundary

- 3.2.6 Three options were considered for a town centre boundary:

Option 1 – Boundary around the extent of the town's commercial activities which seeks to concentrate growth through intensification upon the existing centre together with opportunity sites located within this boundary.

⁴ 'Sustainable Drainage Systems (SUDS) – an introduction', Environment Agency (publication number GEHO0308BNSS-E-E); and 'Sustainable Drainage Systems (SUDS) – a guide for developers', Environment Agency (publication number GEHO0308BNST-E-E).

Option 2 – Includes the area identified in option 1, but extends the boundary to enclose Rosebery Park and Mounthill Gardens.

Option 3 – Includes the area identified in option 1, but extends the boundary to include the residential uses along Ashley Road and the education facilities at the adjoining University for the Creative Arts.

- 3.2.7 A more compact area is preferred for the town centre boundary (Option 1) in comparison to the other options tested, reflecting a desire to focus Plan E on the commercial areas. This will allow the retention of existing uses with higher density residential redevelopment at the most easily accessible location in the borough. By comparison to Option 2 and Option 3 this may help limit the incidences where incompatible uses are adjacent to one another since this is more likely to occur on the edge of the town centre.
- 3.2.8 Benefits were identified for Option 2 and these include the integration of green space with the town centre, providing a more pleasant environment conducive to increased walking and cycling access the town centre. Conversely, the inclusion of the additional areas in Option 2 could increase use of the town centre parks and adversely affect biodiversity in those areas. It is considered, however, that the preferred option would not preclude this and a green infrastructure approach could be adopted for either.
- 3.2.9 Option 3 could offer the benefit of improving integration of education facilities within the town centre. Again, the preferred option would not preclude measures to achieve this.

Policy E2: Amount of housing

- 3.2.10 The Plan E identifies a target for housing of between 635 and 775 new residential units within Epsom Town Centre to 2026. Plan E draws together specific site proposals and opportunity sites that will deliver this amount of housing. As a prescribed target, options are not applicable. Appraisal has, however, considered the potential consequences of delivering less housing in Epsom Town Centre and of exceeding the target.
- 3.2.11 The town centre location would ensure excellent accessibility to services and facilities and supports the maximization of journeys by walking, cycling and public transport. It is in the detail of site specific proposals where Plan E can seek to maximise sustainability benefits.
- 3.2.12 In the case of a higher level of delivery of housing the key issue would be whether design solutions exist to ensure no adverse impacts with respect to flooding, traffic congestion and amenity and that there would be no conflict between the need for housing and the need for land for retail, office and service development. It may be the case that higher densities of development would support a more extensive and comprehensive approach to green infrastructure and renewable energy. There will be a cut off point at which the benefits of high density are outweighed by the disbenefits. It is noted that mixed use developments and as yet unidentified developments within the town centre may

include additional housing provision over and above the target level. The balance point may be a matter for the development control system to test within the guidance provided by Plan E.

- 3.2.13 In the case of less housing it is considered that this would not maximise the potential benefits of the opportunity for mixed use redevelopment of the town centre. In particular, the benefits to sustainable transport and renewable energy may become more difficult to achieve with lower levels of new housing. It would also miss an opportunity to deliver housing in a location with the best access in the Borough to services, facilities and employment.

Policy E3: Retail land

- 3.2.14 The Plan E identifies the role of the town centre as a secondary regional centre. The amount of retail space required has been identified through the Epsom Town Centre Retail Study. An appropriate level of growth in retail provision in Epsom town centre has been established, primarily through considering viability. As a prescribed target, options are not applicable. Appraisal has, however, considered the potential consequences of delivering less retail land in Epsom Town Centre and of exceeding the target.
- 3.2.15 The policy seeks to deliver sufficient retail space to support service provision in the town centre, supporting a broad strategy of delivering mixed use development at the most easily accessible location in the borough. Other policies supplement E3, notably Policy CS3, Policy CS6 and Policy E8 to ensure that new retail development makes a full contribution to wider sustainability issues.
- 3.2.16 In the case of a higher target for retail development the key issue would be whether design solutions exist to ensure no adverse impacts with respect to flooding, traffic congestion and amenity and that there was no conflict between the need for land for retail and other uses. It may be the case that higher densities of development would support a more extensive and comprehensive approach to green infrastructure and renewable energy. There will be a cut off point at which the benefits of high density are outweighed by the disbenefits. There is also the consideration that a significant increase in retail could impact other town centres in the region, potentially altering the rankings in the retail hierarchy. The balance point may be a matter for the development control system to test within the guidance provided by the Plan E.
- 3.2.17 In the case of less retail development it is considered that this would not maximise the potential benefits of the opportunity for mixed use redevelopment of the town centre. In particular, the benefits to sustainable transport and renewable energy may become more difficult to achieve with lower levels of retail provision. It also misses an opportunity to deliver new retail services in close proximity to other facilities and employment and where the majority of the population of the Borough can easily access them.

Policy E4: Retail area

3.2.18 The definition of the primary and secondary retail areas provides clarity to potential investors, can help strengthen the image and character of the town centre and can provide the basis for a policy that identifies where high density development may be appropriate. No boundary options have been considered for the primary area. This is consistent with the objectives and role of sustainability appraisal since this is primarily concerned with strategic matters. It is recognised, however, that the role of a strong primary shopping area can help in the delivery of a strategy that would:

- reduce the need to travel, by concentrating uses in one area;
- avoid noise pollution in areas where PSA uses would not be appropriate
- enhancing safety for pedestrians
- protecting and enhancing heritage

3.2.19 The policy reinforces the objectives of Policy E1 and Policy E3 by defining a primary retail area and seeking to ensure the appropriate management of the uses in these areas.

3.2.20 Together with secondary retail areas, this can positively direct future retail growth to the most accessible location in the Borough where it can have wider benefits for all. It can also guide other essential town centre uses, such as restaurants and financial services, to the right location. To this end, a wider area was considered for inclusion as secondary retail. The preferred option is for a tight boundary, however, since it would not preclude benefits such as additional housing, improved public transport and access to green space, but would maintain an appropriate level of control over uses that could potentially harm amenity.

Policy E5: Employment floorspace

3.2.21 Policy E5 identifies the role and future growth/scale of the town centre with respect to employment use. The policy supports the maintenance of Epsom as a secondary regional centre and seeks to deliver sufficient employment space to support service provision in the town centre and is compatible with housing targets. The overall strategy seeks to achieve a balance of uses at the most easily accessible location in the borough. This policy is written in the context of Core Strategy Policy CS11, which seeks to protect employment land within sustainable locations such as Epsom Town Centre.

3.2.22 Defining the amount of employment space has primarily been a question of viability. The principle has been established through Policy CS14 of the Core Strategy Specific and target figures have not, therefore, been appraised. It is useful at this stage, however, to consider whether higher or lower levels of development might have different sustainability attributes.

3.2.23 In the case of a higher target for employment development the key issue would be whether design solutions exist to ensure no adverse impacts with respect to flooding, traffic congestion and amenity and that there was no conflict between the need for land for employment and other uses. It may be the case that higher densities of development would support a more extensive and comprehensive

approach to green infrastructure and renewable energy. There would be a cut off point at which the benefits of high density are outweighed by the disbenefits, however. The balance point can be tested further through the development control process which could allow higher densities or slightly different mixes of development. A significant increase in the amount of commercial development could stifle opportunities for other types of land use in the town centre.

- 3.2.24 In the case of less employment development it is considered that this would not maximise the potential benefits of the opportunity for mixed use redevelopment of the town centre. Additionally, Epsom's commercial offer may be weakened. In particular, the benefits to sustainable transport and renewable energy may become more difficult to achieve. It also misses an opportunity to deliver new employment provision in close proximity to other facilities and employment and where the majority of the population of the Borough can easily access them.

Policy E6: Leisure provision

- 3.2.25 Policy E6 identifies the role and future growth/scale of the town centre with respect to employment use. It has emerged in recognition of the importance in retaining current services and more effective, mixed use of land at the most easily accessible location in the borough. Accessible leisure forms part of a wider strategy to promote healthy lifestyles.

Policy E7: Building height

- 3.2.26 Policy E7 addresses a key issue with respect to the effective use of PDL. Specifying appropriate heights for buildings is also part of the wider strategy for mixed and balanced growth. The policy will help to ensure the character of development is proportionate to the surrounding area. This prescriptive approach seeks to deliver the benefits of accessibility to services whilst controlling/avoiding adverse impacts such as traffic congestion, pollution and increasing flood risk.
- 3.2.27 Three options were considered in the early stages of plan preparation. A clear and enforceable set of criteria were favoured since it allowed the benefits of mixed development, including high density where appropriate, whilst ensuring control with respect to avoiding potential adverse impacts such as increased flood risk, congestion and harm to amenity.
- 3.2.28 Other policies provide an essential supplementary role to Policy E7 by requiring flood risk (Policy CS6 of the Core Strategy; traffic (E10, E11, E12, E13 and CS16); air quality, noise and light (Policy CS6); open space (E9) and heritage (Policy CS5) to be taken into consideration.

Policy E8: Town Centre Energy Generation

- 3.2.29 Energy efficiency and renewable energy capacity are central to the delivery of sustainable economic growth. Accordingly, Plan E supports decentralised and renewable energy including Community Combined Heat and Power.

3.2.30 Concern arose in appraisal that large scale energy facilities may displace employment development or use land where new employment development could be provided. Plan E identifies appropriate opportunities for the provision of additional employment. It is likely, therefore, that increased renewable energy capacity in the town centre would support a mix of uses. With respect to housing, the combination of decentralised energy and greater energy efficiency will help address fuel poverty.

Policy E9: Public realm

3.2.31 Co-ordination of the public realm supports sustainable economic growth and well being of the community through the creation of attractive, versatile and enjoyable public spaces and can ensure compatibility with heritage interests. Quality design in the public realm helps facilitate high density development. Improved legibility, permeability and attractiveness of the public realm form a key part of the strategy to improve access on foot.

3.2.32 The use of green building techniques and a green infrastructure approach can deliver a more gentle transition from urban forms to a more natural environment. The use of SUDS and natural materials can promote improved water quality and opportunities can be identified to enhance biodiversity.

3.2.33 A number of actions were proposed in Plan E Issues and Options Paper with a view to delivering improvements to the public realm and these were appraised at that time. It was considered that all were potentially appropriate. Appraisal identified that Plan E could include provision to ensure that in delivering improvements to the public realm adverse impacts with respect to other objectives could be avoided and benefits to sustainability maximised. These included compatibility with heritage interests, safety, legibility, permeability and access for all and minimising light pollution. In this respect Policy E9 is supported by other policies, notably Policy CS6 which requires consideration of flood risk and pollution; and Policy CS5 which requires protection and enhancement of heritage interests. Whilst Policy E8 requires renewable energy capacity, an overarching statement or commitment to a climate change/energy strategy may strengthen the position and likelihood of delivery. This can be explored in the Delivery DPD and in the corporate Climate Change Strategy. The issues covered should include flooding, energy and green infrastructure.

Policy E10: Cycling

3.2.34 A number of actions were proposed in the Issues and Options Paper with a view to delivering transport and accessibility objectives. The options were not mutually exclusive. The key issues arising were the need to reduce congestion, improve air quality, reduce greenhouse emissions, a safer town centre, and protection and enhancement of heritage and character. Increasing cycling and reducing car travel is a key measure in ensuring sustainable economic growth. Cycling as an alternative to the car promoted healthy lifestyles and supports equitable access to opportunities.

- 3.2.35 Policy E10 is supplemented by E9 and Policy CS5 which seek to protect and enhance heritage.

Policy E11, Policy E12 and Policy E13: Movement, transport and accessibility

- 3.2.36 The management of traffic to reduce congestion is a key factor in delivering sustainable economic growth and can make a substantial contribution to improving air quality and reducing greenhouse emissions. The combination of these three policies will promote equitable access to opportunities and a safer town centre.

3.3 Appraisal of submission Plan E: Area specific proposals

- 3.3.1 A final appraisal of the Epsom Town Centre Plan E area specific proposals was undertaken following the drafting of a submission Plan E. The appraisal was undertaken by an independent consultant and the findings were further analysed by a peer review group.
- 3.3.2 SA is primarily interested in strategic issues, but there is inevitably some discussion of project level impacts since these can have implications with respect to strategic choices, particularly when considered cumulatively.

Cumulative impacts

- 3.3.1 Appraisal of area specific proposals starts from the assumption that Policy CS14 requires proposals to be brought forward for redevelopment of the town centre and that this principle has already been appraised, as discussed in the preceding sections of this SAR.
- 3.3.2 A consideration of some site specific issues is set out below for each area specific proposal. Taking an overview and considering likely cumulative impacts, it is considered that a more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Consideration could be given to whether greenhouse emissions could most effectively be reduced by funding retrofitting of existing buildings.
- 3.3.3 The findings of this section should inform the preparation of planning applications.

Policy E14: Depot Road and Upper High Street

- 3.3.4 Redevelopment of this area would retain and increase appropriate uses within the town centre, providing employment, services and housing, including affordable housing and homelessness prevention flats, at a location with good accessibility. The enhancement of the public realm would be a key factor with the

retention of trees, landscaping and improvements for pedestrians. On site decentralised chp and sustainable design (Policy CS6 of the Core Strategy) would be required.

Policy E15: The Utilities Site and East Street

- 3.3.4 Redevelopment of this area would retain and increase appropriate uses within town centre, providing employment, community services and housing, including affordable housing, at a location with good accessibility. The enhancement of the public realm would be a key factor with the retention of trees, landscaping and improvements for pedestrians. On site decentralised chp and sustainable design (Policy CS6 of the Core Strategy) would be required.
- 3.3.5 It is noted that development is dependent on the current use for gas holding vacating the site.

Policy E16: Epsom Station

- 3.3.6 Redevelopment of this area would retain and increase appropriate uses within town centre, providing employment, community services and housing, including affordable housing at the site with the best accessibility in the Borough. A new station would help improve the attractiveness of train travel. The enhancement of the public realm would be a key factor with the retention of trees, landscaping and improvements for pedestrians. On site decentralised chp and sustainable design (Policy CS6 of the Core Strategy) would be required.

Policy E17: Other opportunity sites

Comrades Club, The Parade

- 3.3.7 The development of this site would intensify its use, making more efficient use of PDL. The policy should ensure that the existing leisure facilities are re-provided and careful consideration needs to be given to in site parking. This should be minimal due to the sites sustainable location.

Emergency services site, Church Street

- 3.3.8 The development of this site would intensify its use, making more efficient use of PDL. The policy makes provision for a community use to be retained on part of the site should the need be identified following the relocation / colocation of the existing emergency services. Careful consideration needs to be given to in site parking. This should be minimal due to the sites sustainable location.

Global House, Ashley Avenue

- 3.3.9 This is a partially occupied commercial office building that forms the southern extent of the Ashley Centre shopping complex. The site is in a highly accessible location for employment uses. The site offers an opportunity to help meet

employment needs and reduce commuting beyond the borough boundary for work. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility.

Magistrates and County Court, The Parade/ Ashley Road

- 3.3.10 This is an edge of town centre site comprising the vacant Epsom magistrates and County Courts. The site falls within the 'critical drainage area' identified in the SFRA. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility.

Market Place, High Street

- 3.3.11 Enhancement of the public realm would be a key factor with the retention of trees, landscaping and improvements for pedestrians. The enhancement of the historic character of the Market Place is a priority for Plan E. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD.

Pickard House, Upper High Street

- 3.3.12 Pickard House is a vacant office building in Upper High Street that acts as an important gateway into the town, clearly marking the transition between commercial and residential uses in the town centre. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Consideration could be given to whether greenhouse emissions could most effectively be reduced by funding retrofitting of existing buildings.

Land to the rear of The Albion Public House, South Street)

- 3.3.13 Development of this site would intensify its use, making more efficient use of PDL. Design will be very important to ensure new development complements and enhances the conservation area. Parking provision on the site should be minimal to reflect its sustainable location.

TK Maxx store

- 3.3.14 This is a prominent site located at the heart of the town centre's main shopping area. The retail use forms part of the primary retail frontage and there is commercial and leisure on upper floors. The site is in a highly accessible location. The site offers an opportunity to help meet residential needs. Other opportunity sites have been identified that would support the strategy to retain

and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility.

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

- 3.3.15 The area currently operates as a car park and the aim of the policy is to make this area a more useable public space, which has the primary function of being a car park. Additionally, the aim is to facilitate rear servicing to the premises on the southern side of High St (east). Overall the use of the site remains the same, although the provision of rear servicing should help improve traffic circulation. There is potential for permeable surfacing although this will need to be investigated due to the potential impact on the groundwater.

Former Woolworths Store, High Street (east)

- 3.3.16 The former Woolworths site is a historic building that will be retained in retail use on ground and first floor, with residential or office use above. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility.

4 MONITORING AND IMPLEMENTATION

4.1 Monitoring regime

- 4.1.1 The Local Development Framework is a flexible portfolio of planning strategy and policy documents that will be kept relevant and up to date through a rolling process of review and amendment. Monitoring will help to evaluate how the development plan is performing and identify where adjustments need to be made to tailor the documents to meet needs and priorities.
- 4.1.2 Monitoring the significant sustainability issues will also meet the provisions of article 10 of the SEA Directive which requires monitoring of the significant environmental effects of plans. Where adverse impacts occur, the Council is required to take appropriate measures to address them. This could be through the review of an existing LDD or the preparation of a new plan.
- 4.1.3 The Council produces an Annual Monitoring Report for the LDF and regularly updates the LDF evidence base (see paragraph 2.24) and this provides a substantial basis for monitoring impacts. The Sustainability Appraisal Scoping Report will also be reviewed approximately every five years. This will provide additional data ensure that monitoring is comprehensive.

5 CONSULTATION ARRANGEMENTS

5.1.1 The Local Development Framework is a flexible portfolio of planning strategy and policy documents that will be kept relevant and up to date through a rolling process of review and amendment. Monitoring will help to evaluate how the development plan is performing and identify where adjustments need to be made to tailor the documents to meet needs and priorities. Monitoring the significant sustainability issues will also meet the provisions of article 10 of the SEA Directive

APPENDIX A: Plans, policies and programmes influencing the Local Development Framework

International

The Johannesburg Declaration on Sustainable Development
European Spatial Development Perspective (97/150/EC)
European Habitats Directive (Special Areas of Conservation (SACs)) (92/43/EEC)
European Birds Directive (79/409/EEC)
European Nitrates Directive (91/676/EEC)
European Air Quality Directive (96/62/EC)
European Water Framework Directive (2000/60/EC)
European Waste Framework Directive (2006/12/EC)
European Environmental Impact Assessment Directive (97/11/EC)
European Strategic Environmental Assessment Directive (2001/42/EC)
European Energy Performance of Buildings Directive (2002/91/EC)
European Noise Directive (2001/14/EC)
Aarhus Convention 1998 (UN Economic Commission for Europe (UNECE))
Convention on Access to Information, Public Participation in Decision- Making and Access to Justice in Environmental Matters
European Union Sixth Environmental Action Plan (2001)
European Noise Directive (2001/14/EC)
Aarhus Convention 1998 (UN Economic Commission for Europe (UNECE))
Convention on Access to Information, Public Participation in Decision- Making and Access to Justice in Environmental Matters
European Union Sixth Environmental Action Plan (2001)
Kyoto Protocol on Climate Change
United Nations Convention on Human Rights
Valetta Convention (the European Convention on the protection of Archaeological heritage) (2001)

National

Securing the Future – UK Sustainable Development Strategy (March 2005)
Sustainable Communities Plan (2003)
Urban White Paper (2000)
Rural White Paper (2000)
UK Biodiversity Action Plan (1994)
Working with the Grain of Nature: A Biodiversity Strategy for England (October 2002)
Energy White Paper (2003)
National Air Quality Strategy (2000)
White Paper on the Future of Transport: A Network for 2030 (July 2004)
UK Climate Change Programme (2006)
Water Act 2003
Waste Strategy for England and Wales (2000)
The Historic Environment: A Force for our Future (2001)
Natural Environment & Rural Communities Act 2006
Countryside and Rights of Way Act 2006

Wildlife & Countryside Act 1981
Conservation Regulations 1994
Groundwater Regulations 2009
Groundwater Protection Policy (GP3, 2008)

Regional

Planning Policy Statement 1: Delivering Sustainable Development (2005)
Planning Policy Guidance 2: Green Belts (1995)
Planning Policy Statement 3 : Housing (2006)
Planning Policy Statement 4 Planning for sustainable economic growth (draft 2009)
Planning Policy Statement 6: Planning for Town Centres (2005)
Planning Policy Statement 7: Sustainable Development in Rural Areas (2004)
Planning Policy Guidance 8: Telecommunications (2001)
Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)
Planning Policy Statement 10: Planning and Sustainable Waste Management (2005)
Planning Policy Statement 12: Local Spatial Planning (2008)
Planning Policy Guidance 13: Transport (2001)
Planning Policy Guidance 14: Development on Unstable Land
Planning Policy Guidance 15: Planning and the Historic Environment (1994)
Planning Policy Guidance 16: Archaeology and Planning (1990)
Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation (2003), and Companion Guide: Assessing Needs and Opportunities.
Planning Policy Guidance 18: Enforcing Planning Control (1991)
Planning Policy Guidance 19: Outdoor Advertisement Control (1992)
Planning Policy Statement 22: Renewable Energy (2004) and Companion Guide
Planning Policy Statement 23: Planning and Pollution Control (2004)
Planning Policy 24: Planning and Noise (1994)
Planning Policy Statement 25 : Development and Flood Risk (2006)
Circular 22/91 – Travelling Showpeople
Circular 01/2006 – Planning for Gypsy and Traveller Caravan Sites
Circular 5/05 – Planning Obligations
Circular 06/2005 Biodiversity & Geological Conservation

Regional

South East Plan (2009)
Regional Transport Strategy (2004)
Regional Housing Strategy (2006)
Regional Economic Strategy 2006 to 2016 A Framework for Sustainable Prosperity
Regional Strategy for Energy Efficiency and Renewable Energy 2004
Integrated Regional Framework (2004)
Managing Flood Risk : Thames Region Catchment Flood Management Plan
South East Biodiversity Strategy

County

Surrey 2020 – Community Strategy for Surrey
Surrey Minerals Local Plan (1993)
Surrey Minerals and Waste Development Framework – in preparation
Surrey Waste Development Framework

Surrey Economic Partnership – Economic Strategy
Surrey School Organisation Plan
Surrey Biodiversity Action Plan
Surrey Cultural Strategy
Surrey Infrastructure Capacity Study
Surrey Heritage Strategy
Surrey Local Transport Plan 2006/7 –2010/11
Surrey Draft Crime and Disorder Reduction Strategy
Surrey Design Guide (2001)
Surrey ancient woodland survey – in preparation

Local

Epsom & Ewell Corporate Plan 2007- 2011
Epsom &Ewell District Wide Local Plan
Epsom & Ewell Community Strategy 2003
Epsom & Ewell Community Safety Partnership Plan 2008-2011
Epsom & Ewell Borough Youth Plan 2008 – 2012

APPENDIX B: Baseline Information

Output Indicators	Type of Indicator	Document Source	Frequency of reporting	2007/2008	2008/09	Target / Notes	Trend
Green Belt/ Open Space							
CS2 Number and type of planning permissions granted in the green belt	OI	Core Strategy	6 monthly	None apart from the Epsom Hospital Cluster development which is recognised as a Major Developed Site in the Green Belt. Government guidance recognises these are exceptional circumstances for Green Belt development	None apart from the Epsom Hospital Cluster development which is recognised as a Major Developed Site in the Green Belt. Government guidance recognises these are exceptional circumstances for Green Belt development	PPG2/ South east Plan/ Core Strategy CS2= strict control over inappropriate development. Target: All development allowed in the Green Belt meets criteria in national policy	remained the same
CS3 % of SSSIs in favourable condition or improving.	OI	Core Strategy	Annually	Stones Road: 100% favourable condition Epsom & Ashted Common: 36.47% favourable, 45.75 unfavourable recovering	Stones Road: 100% favourable condition. Epsom Common: 6.47% favourable, 45.75 unfavourable recovering (as last year)	Policy CS3= 95% of the SSSI should be in a favourable or recovering condition by 2010 (Government PSA target)	remained the same
CS3 Number and area of Sites of Nature Conservation Interest (Grade 2), Sites of Nature Conservation Interest (Grade3), and ancient woodlands	OI	Core Strategy	N/A	No change in size, amount and range	No change in size, amount and range	To be set in later DPDs	remained the same
CS4 Amount and range of open space provided in the borough relative to requirements set out in the most recent open space audit	OI	Core Strategy	Whenever there is a review of the open space audit	There has been no change in the amount of open space provided in the Borough in this reporting year	There has been no change in the amount of open space provided in the Borough in this reporting year	Policy CS4= Provision should meet defined audit standards	remained the same

Biodiversity							
CS3 Number of new developments providing mitigation for loss of biodiversity or/and incorporating features to improve existing biodiversity	OI	Core Strategy	N/A	This indicator has not yet been monitored formally	This indicator has not yet been monitored formally	To be set in later DPDs	no data
E2 Change in areas and populations of biodiversity importance, including:(i) change in priority habitats and species (by type); and	COI	AMR	Yearly	No change	No change	To be set following completion of BAP	remained the same
7a % of rivers in plan area whose ecological (biological) quality is rated 'good'	Sig effects	SA	No data currently collected	N/A	River Hogsmill has 'Moderate' ecological potential	Good Ecological Potential by 2027, Good Chemical Status by 2027	no trend data yet
7b % of rivers in plan area whose chemical quality is rated as 'good'	Sig effects	SA	No data currently collected	N/A	River Hogsmill has 'Not Good' status	Good Ecological Potential by 2027, Good Chemical Status by 2027	no trend data yet

7c Quality & quantity of ground water	Sig effects	SA	Monthly	A groundwater emergence zone is shown in the SFRA, taken from the Defra Groundwater Flooding Scoping Study (2004). It shows that within the area identified, groundwater could rise to within 2m of the ground surface following prolonged above average rainfall.	A groundwater emergence zone is shown in the SFRA, taken from the Defra Groundwater Flooding Scoping Study (2004). It shows that within the area identified, groundwater could rise to within 2m of the ground surface following prolonged above average rainfall.		no data
Areas of special character							
CS5 Percentage of conservation areas where appraisals and management plans have been completed	OI	Core Strategy	Annually	15%	50%		progress being made
CS5 No of listed buildings within the Borough on the national 'Buildings at Risk' register	OI	Core Strategy	N/A	1 - Riding School, Durdans, Chalk Lane	1 - Riding School, Durdans, Chalk Lane		remained the same
CS5 Number of 'locally listed' buildings on the Councils local 'Buildings at Risk' register	OI	Core Strategy	N/A	N/A	N/A	The Council does not currently have a local Buildings at Risk register	no data
3a Annual average of NO2 and PM10, with AQMAs, relative to National standards	Sig effects	SA	Annually (Jan to Dec)	32 (No2 and Benzene Monitoring Results- NO2 average at all monitored locations)	38.86 (No2 and Benzene Monitoring Results- NO2 average at all monitored locations)	To improve air quality - AQMA was designated in Ewell village in July 2007	increase

Flooding							
1a Number of properties at risk from flooding	Sig effects	SFRA	Whenever there is an update of the SFRA		1135 within flood zone 3. A further 241 within flood zone 2 (SFRA). 3900 properties at risk from Surface Water Flooding (Defra National Rank Order of Settlements Susceptible to Surface Water Flooding)		remained the same
1d Area of land identified for flood storage purposes as part of catchment flood management plan considered for future revision	Sig effects	Hogsmill Integrated Catchment Study	N/A	Unknown	Unknown		no data
CS6 Number of planning permissions granted contrary to EA advise on flood risk	OI	Core Strategy		100% of decisions made in accordance with Environment Agency advice	100% of decisions made in accordance with Environment Agency advice		remained the same
Housing							
CS7 Number of net housing completions per annum	OI	Core Strategy	yearly	281	221		Exceeded housing target of 199
13j Number of unfit homes in the district	Sig effects	SA	yearly		4372	dwellings with a Category 1 hazard when assessed against the Housing Health and Safety Rating System	no comparable data
13h Number of households on the housing register	Sig effects	SA	yearly		1339		no comparable data

<p>H2c Housing trajectory showing: <i>(i)</i> net additional dwellings over the previous five year period or since the start of the relevant development plan document period, whichever is the longer; <i>(ii)</i> net additional dwellings for the current year; <i>(iii)</i> projected net additional dwellings up to the end of the relevant development plan document period or over a ten year period from its adoption, whichever is the longer;</p>	COI	AMR	Quarterly	See AMR	See AMR	The target for the plan period 2006-2026 is 3980 dwellings, which equates to 199 per annum.	housing trajectory prepared for AMR
<p>H3/ CS8 Percentage of new and converted dwellings on previously developed land.</p>	COI/OI	AMR	Annually	100%	100%	The Council has a target of 100% new housing to be provided on previously developed land in urban areas	remained the same
<p>18C Average density on sites with 10 or more dwellings (Dwellings per Ha).</p>	Sig effects	SA	6 monthly		62.8 dph		no comparable data

Percentage of new dwellings completed at: (i) less than 30 dwellings per hectare; (ii) between 30 and 50 dwellings per hectare; and (iii) above 50 dwellings per hectare.	(no longer COI)	AMR	6 monthly	(i) 9% (ii) 26% (iii) 65%	(i) 11% (ii) 19% (iii) 70%	Policy H5 of the South East Plan sets out an overall regional density target of 40 dwellings per hectare over the plan period.	More developments completed at above 50 dph
Affordable housing							
H5 / CS9 Number of affordable housing units completed per annum (and as a % of total net completions)	COI/OI	AMR (also BVPI LPI)	Annually	78 affordable units. 26% of all completions 2007-08	41 affordable units. 18% of all completions 2008-09	Check AMR figure against BVPI Housing's figure	less affordable units completed 2008-0 but still on target to meet 35% in plan period
CS9 Number of social rented and intermediate affordable housing (and as a % of total affordable housing completions)	OI	Core Strategy	Annually	41 Social rent/ 37 intermediate (53% social rent/ 47% intermediate)	41 Social rent/ 0 intermediate. (100% social rent)		More social rented properties in 2008-09
Gypsy & Traveller							
CS10 Number of pitches provided for permanent gypsy and traveller accommodation and pitches for travelling showpeople, against the requirements identified in the South East Plan and needs in the Gypsy and Traveller Accommodation Assessment	OI	Core Strategy	N/A	There has been no additional pitches provided this year	There has been no additional pitches provided this year	no target set	no change

Business development/ employment							
9 Percentage of people of working age that are economically active	Sig effects	SA	N/A	81%	81%		no change
18d The number of retail developments within and around the town centres	Sig effects	SA	yearly	5741m2 gain in A1 floorspace this reporting year in Epsom town centre	434m2 gain in A1 floorspace this reporting year in Epsom town centre		retail gain each year (relatively small)
CS14 Amount of retail floorspace gained/ lost within town centre, and % within defined primary or secondary shopping areas	OI	Core Strategy	yearly	5741m2 gain in A1 floorspace this reporting year in Epsom town centre	434m2 gain in A1 floorspace this reporting year in Epsom town centre		retail gain each year (relatively small)
10a The number of granted planning permissions for commercial development	Sig effects	SA			11		no comparable data
CS15 Amount of retail space gained/ lost in the local centres	OI	Core Strategy		None	None		remained the same
BD1 Amount of floorspace developed for employment by type	COI	AMR		-679m2	-850m2		The trend has been for a loss of employment floorspace rather than a gain.
BD2 Amount of floorspace by employment type, which is on previously developed land	COI	AMR		100%	100%		remained the same
BD3 Employment land available by type	COI	AMR		B1a 0.2 ha, B1c 0.01 ha, B2 0.06 ha, B8 0.01 ha, Mixed B uses 0.4 ha.	B1a 0.10 ha, Mixed B uses 0.41 ha.		

10d Percentage of vacant employment floorspace	Sig effects	SA			7.10%		no comparable data
10B Amount of employment land lost to residential development	Sig effects	SA		Unknown	0.01 ha.		no comparable data
CS11 Amount of employment floorspace gained and lost per use class (in Epsom Town Centre, Ewell Village, defined employment areas and rest of Borough	COI/ OI	AMR			Total: A1 434 m2. A2 60 m2. B1 -850 m2. Town Centre: A1 282 m2. B1 - 730 m2.		no comparable data
11e Number of residents working at, or from home	Sig effects	SA		3.066	3.066	2001 Census data	no comparable data
Local Services							
CS12 % of developments that would potentially create, or add to, a deficit in service or community infrastructure provision, that would make good the potential deficits	OI	Core Strategy	yearly	Unknown	100% (since the adoption of the Developer contributions SPD in 2008 this is used routinely when application are permitted)		no comparable data
CS14 Amount and % of completed residential, business and cultural/ leisure development within the town centre	OI	Core Strategy	yearly	Unknown	123 RESIDENTIAL UNITS . A1 282 m2. B1 - 730 m2.		no comparable data
14F Losses/ gains in number of health care facilities	Sig effects	SA		Unknown	None		no comparable data

CS13 Net change in the type and number of community, cultural and built sports facilities provided each year within the Borough	OI	Core Strategy		No loss	No loss- various improvements to facilities (as set out in AMR 2009)		no loss
Sustainability/transport							
20f/ CS16 % of major residential developments located within 30 minutes public transport time of health, education, retail and employment facilities.	OI	Core Strategy		98.67%	100%		slight improvement to 100% highly accessible
17c Number and direction (and distance) of journey to work movements	Sig effects	SA		Unknown	Unknown		no data
Percentage of all respondents satisfied with the local bus service	Sig effects	SA (also BVPI)	Annually	Unknown	Unknown		no data
20C Number of schools with travel plans	Sig effects	SA		305 schools in Surrey had travel plans in 2007	No more up to date figures available		no comparable data
1B&C Number of properties built with sustainable drainage installed or linked to sustainable drainable drainage systems	Sig effects	SA		Unknown	Unknown		no data
20H Proportion of new development incorporating maximum parking standards	Sig effects	SA		Unknown	Unknown		no data

Number of homes taking up energy saving grants for loft insulation, double glazing, or cavity wall insulation	Sig effects	SA		Unknown	Unknown		no data
23 A Installed capacity for energy production from renewable sources	Sig effects	SA		Unknown	Unknown		no data
23C Installed capacity for heat generation from renewable sources	Sig effects	SA		Unknown	Unknown		no data
% of new build + retrofit homes meeting ECO homes 'excellent' standard & % meeting BREEAM 'excellent' standard	Sig effects	SA		Unknown	Unknown		no data
E3 Renewable energy capacity installed by type.	OI	AMR			10% requirement is routinely applied to all relevant planning applications		no data
The number of new dwellings incorporating greywater/ rainwater	Sig effects	SA		Unknown	Unknown		no data
22c Number of homes incorporating CHP heating	Sig effects	SA		Unknown	Unknown		no data
23G Area of land planted with energy crops for transport biofuels	Sig effects	SA		Unknown	Unknown		no data
Social							

13i Average property price compared against average workplace earnings	Contextual	SA		7.7	6.1		According to this data, housing in the Borough has become more affordable for buyers on average earnings
14d Life expectancy	Contextual	SA		Male; 81.19. female: 84.33	Male; 81.19. female: 84.33		remained the same
15d Average score for Indices of Multiple Deprivation (IMD) 2004	Sig effects	SA		335	335		remained the same
16a The number of recorded offences per 1000 people.	Sig effects	SA		no data	no data		no data
Violence against person				1020	870		Reduction
Sexual offences							no data
Robbery				60	43		Reduction
Burglary				376	312		Reduction
Theft of a motor vehicle				122	121		Reduction
Theft from a motor vehicle				332	295		Reduction
Number of drug offences				no data	no data		no data
16c Pedestrian/ cyclists number killed and seriously injured	Sig effects	SA		no data	no data	latest data available is Jan- Dec 03 (11 people)	no data

APPENDIX C:

Consultation responses to additional / supplemental scoping

English Heritage (12th January 2010)

(Epsom and Ewell Borough Council response indented text)

English Heritage advises that more explicit consideration needs to be given to cover issues around changing character, distinctiveness and the public realm. The Vision for the town centre refers to reinforcing the distinctiveness of different character areas, while the Issues and Options consultation drew attention to the need to make more of the town's identity, character and management, to include rationalising the public realm.

Plan E identifies this as a key issue and the SAR makes numerous references to the importance of this vision/heritage objectives. Plan E draws on the Characterisation of the Area Study 2005 (as referenced at paragraph 2.2.4 of the SAR) and is also supported by Core Strategy DPD policies (as referenced at paragraph 2.2.4 of the SAR) in protecting heritage. The delivery of and precise nature of enhancement will be through area specific proposals (planning applications), but the SAR highlights that Policy E4, Policy E7, policy E9 and Policy E10 will support and guide this process along with Core Strategy DPD policies and the forthcoming Delivery DPD policies. Proposals for the Depot Road/Upper High Street, the Utilities Site/East Street, Epsom Station and Market Place are acknowledged as a particularly important opportunity for enhancing character (commentary in SAR at paragraphs 3.3.4, 3.3.5, 3.3.6 and 3.3.11).

English Heritage identifies that EEBC sustainability objectives 18 and 19 have the closest bearing upon the historic environment. While the need for new development to respect the conservation area and listed buildings is important, there is also a need to have regard to non designated, locally important features that can also make a significant contribution to the character of the town centre.

The importance of non designated sites is recognised in Table 2 of the SAR. Proposals for the Depot Road/Upper High Street, the Utilities Site/East Street, Epsom Station and Market Place are acknowledged as a particularly important opportunity for enhancing character (commentary in SAR at paragraphs 3.3.4, 3.3.5, 3.3.6 and 3.3.11).

English Heritage welcomes the reference to the need to identify heritage interests associated with sustainability objective 19, and suggest that this be developed to include reference to understand and value.

The SA Objectives have a long standing status and have not been amended for the appraisal of Plan E. Future revisions of the SA Objectives can add the reference to SA Objective 19. It should be noted, however, that understanding and valuing character has been a key element of producing the Conservation Area Appraisal (referenced Table 2).

English Heritage questions whether the word 'natural' in sustainability objective 19 would be better placed with sustainability objective 8?

It is acknowledged that this may constitute 'double counting' of the 'natural environment' in the SA Objectives, but this is not the only instance and, given the interlinked and overlapping nature of sustainability issues, is unavoidable. The reference to natural in SA Objective 19 emphasises the linkage between heritage and open space/biodiversity and is not considered to dilute the importance of heritage in its own right.

Natural England (17th December 2009)

Natural England encourages consideration of enhancement opportunities in the site appraisal process where possible. For example, the appraisal could assess the proximity of the town centre to existing green infrastructure or biodiversity habitats and consider its potential to provide opportunities for enhancement of the area's green infrastructure network and/or biodiversity resource.

The importance of these issues are acknowledged in Table 2 of the SAR. Paragraph 3.2.4 emphasises the need for/opportunity to co-ordinate green infrastructure measures through the various area specific proposals and in the Delivery DPD.

Natural England promotes the inclusion of a thorough assessment of the environmental capacity of an area to inform decisions on future development within the town centre. As such we advise that the following key environmental indicators are assessed to determine the site's environmental capacity and therefore potential for further development. Natural England lists the following indicators and the SA Objective that includes that issue is **added in brackets**.

- Air quality (**SA Objective 3**)
- Water quality and quantity (**SA Objective 7**)
- Soil quality (**SA Objective 2**)
- Geology (**SA Objective 8/19**)
- Biodiversity (**SA Objective 8**)
- Landscape (**SA Objective 19**)
- Tranquillity (**SA Objective 14/19**)
- Open Space (**SA Objective 8/14**)
- Historic Environment (**SA Objective 19**)

Environment Agency (15th January 2010)

The Environment Agency considers the following issues to be key to the Epsom Town Centre area. Text has been added to identify where these issues have been considered in the SAR (indented text).

Flood Risk - Various sources of flooding have been identified. An up-to-date Strategic Flood Risk Assessment (SFRA) is a key document to inform the SA. We encourage the use of Sustainable Drainage Systems (SUDS) subject to the protection of groundwater.

Paragraph 2.2.4 of the SAR refers to the latest SFRA. Policy CS3 and Policy CS6 of the Core Strategy DPD require SUDS where appropriate.

Groundwater Quality - Epsom Town Centre is underlain by a Major Aquifer that is used to provide water for human consumption (East St Pumping Station). The groundwater regulations and guidance will help to protect this important resource.

Reference is made to the major aquifer in Table 2.

Water Resources - This area is designated as an area of serious water stress. This designation is supported by the local water resource status of “no water available” in the Hogsmill catchment, as assessed in the London CAMS. The use of water efficiency measures is highly recommended.

The issue is acknowledged in Table 2 and the importance of addressing water efficiency in new development is emphasised at paragraph 3.2.3.

Biodiversity - Safeguarding open space and the redevelopment of brownfield land are welcomed. Redevelopment provides great opportunities to enhance biodiversity and provide open spaces, which can also help to promote social inclusion.

The issue is acknowledged in Table 2 and the importance of enhancing biodiversity in new development is emphasised at paragraph 3.2.3.

The Environment Agency has also commented on the appropriateness and scope of the sustainability objectives.

SO1 – To minimize the harm from flooding

Your SFRA is an important evidence base that informs the SA. It is therefore important that the data within it remains up-to-date. The assessment should be checked to see if any of the data used within it has been superseded. Any new flood data should be incorporated into it. Our Flood Map has been amended within Epsom Town Centre in light of the findings of the SFRA. We consider that you will now need

to update the Flood Zone maps within your assessment for it to form part of a sound evidence base.

A reference to up dated information is included in Table 2 of the SAR and a commentary has been included in the SAR at paragraph 3.2.4 to reflect these concerns.

SO7 – To maintain and improve the water quality of the rivers and groundwater

SUDS

Please note that appropriately designed SUDS can be used to mitigate the increase in diffuse urban pollution from development. We encourage the use of SUDS except where the quality of groundwater could be affected.

Policy CS3 and Policy CS6 of the Core Strategy DPD require SUDS where appropriate.

As recognised in the consultation document a significant proportion of the town centre is within an Inner Source Protection Zone which relates to a drinking water abstraction from the Principal Chalk Aquifer. This area is considered to be at high risk from pollution. Therefore, as per our Groundwater Protection Policy (GP3, 2008) only clean roof water is acceptable to be discharged to ground in this sensitive area and all discharges to ground must comply with the Groundwater Regulations 2009.

We advise therefore that the following documents are used to inform the SA;

- Groundwater Protection Policy (GP3, 2008) available at <http://www.environment-agency.gov.uk/research/library/publications/40741.aspx>
- Groundwater Regulations 2009 available at <http://www.environment-agency.gov.uk/business/regulation/31881.aspx>

These have been added to the document review (Appendix A).

This may act as a constraint to the use of SUDS within this area and should be taken into consideration in the early stages of any development plan/design process. Where the risk of groundwater contamination is high, in the opinion of the Environment Agency, discharge may be prohibited or controlled by means of a formal authorisation under the Groundwater Regulations 1998 or consent under the Water Resources Act 1991.

This issue is acknowledged in paragraph 3.2.4 which identifies over arching issues relevant to all area specific proposals.

Further information on sustainable drainage systems can be found within our publications, which we also advise are used to inform the SA;

- 'Sustainable Drainage Systems (SUDS) – an introduction', Environment Agency (publication number GEHO0308BNSS-E-E).
- 'Sustainable Drainage Systems (SUDS) – a guide for developers', Environment Agency (publication number GEHO0308BNST-E-E).

More detailed information can be found in the freely available CIRIA '*SUDS Manual*' (www.ciria.org).

Sewerage Infrastructure

Proposed developments should undertake to ensure that any increase in demand made on the foul drainage can be adequately managed both in terms of volume flows and treatment quality by existing drainage networks and sewage treatment facilities. Epsom and Ewell's SFRA indicates in Appendix E that flooding from foul water has previously occurred in the Epsom Town Centre area. We advise that Thames Water are requested to acknowledge that the present infrastructure and asset management will be sufficient or commit to improvements as and when they become necessary.

This issue is acknowledged in Table 2 and paragraph 3.2.4 which identifies over arching issues relevant to all area specific proposals.

SO8 – To conserve and enhance biodiversity within the plan area.

Appropriately designed SUDS can be used to provide habitat within a development. Please see the section on SO7 for further information and guidance.

The multi purpose role of SUDS within the context of green infrastructure is acknowledged in paragraph 3.2.4 which identifies over arching issues relevant to all area specific proposals.

SO15 – To reduce poverty and social exclusion

We would advise the guidance set out in the CABI document "Start with the park" which looks at the benefit green space can have on the community including promoting social inclusion. Please find this document at;

<http://www.cabi.org.uk/publications/start-with-the-park>

The multi purpose role green space within the context of green infrastructure is acknowledged in paragraph 3.2.4 which identifies overarching issues relevant to all area specific proposals.

SO21 – To ensure the District is prepared for the impacts of climate change

We advise that this should acknowledge the potential impacts of climate change on flood risk within the Town Centre. Clearly, this will link with the issues for objective 1.

Reference is included at Table 2.

SO21 highlights water resources as being a risk for the area. This is supported by the recent designation of being in an area of serious water stress and the local CAMS results of “no water available”. We advise that the London CAMS is used to inform the SA, specifically “Water Management Unit 5 – Hogsmill”. Please see below for the link to this document;

<http://www.environment-agency.gov.uk/research/planning/33432.aspx>

A reference to the issue is included in Table 2 of the SAR and a commentary has been included in the SAR at paragraph 3.2.4 to reflect the concerns raised.

SO22 – To increase energy efficiency of new and existing development

We would like to see SO22 include water efficiency measures. Targeting water efficiency in hot water fixtures, fittings and appliances in new, refurbished and retrofitted buildings also contributes to reducing energy use and carbon emissions.

The role of water efficiency in reducing energy use is acknowledged in Table 2 and its importance emphasised at paragraph 3.2.4.

APPENDIX D: Appraisal Matrices

EPSOM TOWN CENTRE PLAN E				
Policy E1: The Town Centre Boundary				
Identifies the area to which Plan E and Core Strategy Policy CS14 apply.				
Appropriate uses include retail, employment, higher density housing and community facilities. A key objective is to make a positive contribution to vitality and viability.				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	?	?	?	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary. <i>Mitigation may be required on specific sites.</i>
2) To reduce land contamination and safeguard soil quality and quantity	0	✓	✓	Redevelopment would address where this exists. See Policy CS1 and Policy CS6 of the Core Strategy
3) To ensure air quality continues to improve	0	0	0	No significant impact when compared with existing policy.
4) To reduce greenhouse gases	0	0	0	See Policy E8
5) To reduce noise pollution	0	0	0	The boundary seeks to retain town centre uses within the existing area that is recognised as the town centre. This may help limit the incidences where incompatible uses are adjacent to one another on the edge of the town centre. Also controlled by Policy CS6.
5) To reduce light pollution	0	0	0	As above.

7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution. Forms of SUDS may be restricted due to Source Protection Zone.
8) To conserve and enhance biodiversity within the plan area	0	0	0	Policy CS3 encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	✓	✓	✓	Supports retention of employment within the boundary and redevelopment to improve vitality.
10) Make land available to meet the needs of the economy	✓	✓	✓	Supports retention of employment land within the boundary and redevelopment that can increase provision.
11) Support economic growth which is inclusive, innovative and sustainable	✓	✓	✓	Allows redevelopment and change of use that contributes to vitality and viability of the town centre.
12) Balancing the needs for employment and housing to reduce the need to travel	✓	✓	✓	Supports retention and more effective, mixed use of land at the most easily accessible location in the borough.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	✓	✓	✓	Supports housing provision in the town centre. Also higher density housing.
14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	Supports retention and more effective, mixed use of land at the most easily accessible location in the borough.
15) To reduce poverty and social exclusion	✓	✓	✓	Supports retention and more effective, mixed use of land at the most easily accessible location in the borough.
16) To create and maintain safer and more secure communities	0	0	0	Policy CS5 and Policy CS14 of the Core Strategy require high quality design that delivers safe public

				and private environments.
17) To improve accessibility to all services and facilities	✓✓	✓✓	✓✓	Supports retention and more effective, mixed use of land at the most easily accessible location in the borough.
18) To make the best use of previously developed land and existing buildings	✓✓	✓✓	✓✓	Supports retention and more effective, mixed use of land at the most easily accessible location in the borough.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	✓	✓	✓	Supports retention and more effective, mixed use of land at the most easily accessible location in the borough, <i>although more people may be attracted into the town centre, which could increase congestion</i>
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	In addition to the provisions of Policy CS6 it is noted the town centre is an area of serious water stress.
22) To increase energy efficiency of new and existing development	0	✓	✓	Policy E8 encourages renewable energy and Policy CS6 of the Core Strategy sustainable design. Site specific proposals also include measures. An overarching statement or commitment to a climate change/energy strategy may strengthen the position and likelihood of delivery. A mix of uses within the town centre may help make some schemes more viable e.g. CHP
23) To increase the production and use of renewable energy	0	✓	✓	
Summary of key issues				

A more compact area is preferred for the town centre boundary in comparison to the other options tested, as this reflects a desire to focus Plan E on the commercial areas while allowing for higher density residential redevelopment. The boundary seeks to retain town centre uses within the existing area that is recognised as the town centre. This may help limit the incidences where incompatible uses are adjacent to one another on the edge of the town centre. This supports the retention and more effective, mixed use of land at the most easily accessible location in the borough.

Policy E8 encourages renewable energy, Policy CS6 of the Core Strategy sustainable design and site specific proposals also include sustainability measures. In addition, other policies, such as Policy CS3 ensure biodiversity and flooding will be addressed. An overarching statement or commitment to a climate change/energy strategy may strengthen the position and likelihood of delivery. This can be explored in the Delivery DPD and in the corporate Climate Change Strategy. The issues covered should include flooding, energy and green infrastructure.

EPSOM TOWN CENTRE PLAN E

Policy E2: Amount of housing

Identifies a target for housing of between 635 and 775 new residential units within the Town Centre to 2026. Draws together specific site proposals and opportunity sites.

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	See individual site proposals. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	✓	✓	✓	See individual site proposals. However there are a number of sites within the town centre which have been identified as having potential contamination
3) To ensure air quality continues to improve	0	✓	✓	Housing in locations where journeys by sustainable transport can be maximised.
4) To reduce greenhouse gases	0	✓	✓	See individual site proposals.
5) To reduce noise pollution	0	0	0	Controlled by Policy CS6.
5) To reduce light pollution	0	0	0	Controlled by Policy CS6.

7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	0	0	Policy CS3 encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	0	0	0	Whilst residential is potentially a competing use for land, the overall strategy identifies sufficient land for commercial uses.
10) Make land available to meet the needs of the economy	0	0	0	Whilst residential is potentially a competing use for land, the overall strategy identifies sufficient land for commercial uses.
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	Mixed use redevelopment that contributes to vitality and viability of the town centre is encouraged. Housing can be part of mixed used developments
12) Balancing the needs for employment and housing to reduce the need to travel	0	✓	✓	Housing in a location with services, facilities and employment opportunities.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	✓	✓	✓✓	Supports delivery of housing. Affordable provision guided by Policy CS7 of the Core Strategy.
14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	Supports housing in a location with good accessibility to services and facilities.
15) To reduce poverty and social exclusion	✓	✓	✓	Supports housing in a location with good accessibility to services and facilities.
16) To create and maintain safer and more secure communities	✓	✓	✓	Policy CS5 and Policy CS14 of the Core Strategy require high quality design that delivers safe public and private environments. Housing in the town centre can help increase natural

				surveillance
17) To improve accessibility to all services and facilities	✓	✓✓	✓✓	Housing in a location with services, facilities and employment opportunities.
18) To make the best use of previously developed land and existing buildings	✓✓	✓✓	✓✓	Higher density redevelopment encouraged in the town centre.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	0	0	0	Journeys by sustainable transport can be maximised. New development may increase the total stress on the road network, but the town centre location represents the most sustainable transport pattern and minimises the negative effects.
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	Policy E8 encourages renewable energy. In addition to the provisions of Policy CS6 it is noted the town centre is an area of serious water stress. Site specific proposals include measures.
22) To increase energy efficiency of new and existing development	0	✓	✓	
23) To increase the production and use of renewable energy	0	✓	✓	
Summary of key issues				
<p>Housing in a location with good accessibility to services and facilities and where journeys by sustainable transport can be maximised. Site specific proposals and other policies of the Core Strategy, including Policy CS7 (Affordable Housing) and Policy CS6 (Sustainable design) and Policy E8 (energy) of Plan E seek to maximise sustainability benefits.</p> <p>A target figure was not appraised in the initial appraisal of the Issues and Options with respect to housing although the principle is established in Policy CS8 of the Core Strategy. It is appropriate, therefore, to consider whether higher or lower levels of residential development might have different sustainability attributes.</p> <p>In the case of a higher target for housing the key issue would be whether design solutions exists to ensure no adverse impacts with respect to flooding, traffic congestion and amenity and that there was no conflict between the need for housing and the need for land for retail, office and service development. It may be the case that higher densities of development would support a more extensive and comprehensive approach to green infrastructure and renewable energy. There will be a cut off point at which the benefits of high density are outweighed by the disbenefits. It is noted that mixed use developments and developments adjacent to the town centre may include additional housing provision over and above the target level. The balance point may be a matter for the development control system to test within the guidance provided</p>				

by Plan E.

In the case of less housing it is considered that this would not maximise the potential benefits of the opportunity for mixed use redevelopment of the town centre. In particular, the benefits to sustainable transport and renewable energy may become more difficult to achieve with lower levels of new housing. It also misses an opportunity to deliver housing in a location with the best access in the Borough to services, facilities and employment.

EPSOM TOWN CENTRE PLAN E

Policy E3: Retail

Identifies the role of the town centre as a secondary regional centre and the target amount of retail growth.

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	See Policy CS6 of the Core Strategy DPD. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	✓	✓	✓	Redevelopment would address where this exists. See Policy CS1 and Policy CS6 of the Core Strategy
3) To ensure air quality continues to improve	0	✓	✓	Part of a strategy to ensure mixed use in the town centre with an appropriate level of retail to meet the needs of the catchment population and reduce the need to travel.
4) To reduce greenhouse gases	0	✓	✓	See Policy E8.
5) To reduce noise pollution	0	0	0	The boundary seeks to retain town centre uses within the existing area that is recognised as the town centre. This may help limit the incidences where incompatible uses are

				adjacent to one another on the edge of the town centre. Also controlled by Policy CS6.
5) To reduce light pollution	0	0	0	As above.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	0	0	Policy CS3 encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	✓	✓	✓	Supports retention of retail employment within the boundary and redevelopment to improve vitality.
10) Make land available to meet the needs of the economy	✓	✓	✓	Supports the maintenance of Epsom as a secondary regional centre.
11) Support economic growth which is inclusive, innovative and sustainable	✓	✓	✓	Seeks to deliver sufficient retail space to support service provision in the town centre and meet the needs of the catchment population.
12) Balancing the needs for employment and housing to reduce the need to travel	?	?	?	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough. Retail offers a form of relatively unskilled and low paid employment. High house prices in the Borough may encourage in-commuting to fill these types of jobs
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Compatible with the co-delivery of housing.
14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most

				easily accessible location in the borough.
15) To reduce poverty and social exclusion	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
16) To create and maintain safer and more secure communities	0	0	0	Policy CS5 and Policy CS14 of the Core Strategy require high quality design that delivers safe public and private environments.
17) To improve accessibility to all services and facilities	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
18) To make the best use of previously developed land and existing buildings	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough. However, may encourage more people to use the town centre.
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	Policy E8 encourages renewable energy. In addition to the provisions of Policy CS6 it is noted the town centre is an area of serious water stress. Site specific proposals also include measures.
22) To increase energy efficiency of new and existing development	0	✓	✓	
23) To increase the production and use of renewable energy	0	✓	✓	

Summary of key issues

The policy seeks to deliver sufficient retail space to support service provision in the town centre. As part of a broader strategy this supports a sustainable, mixed use of land at the most easily accessible location in the borough. The principal benefits are good accessibility and the potential to deliver more sustainable transport patterns. Other policies, notably Policy CS3, Policy CS6 and Policy E8 would ensure that new retail development makes a full contribution to wider sustainability issues.

The amount of retail space required has been an Epsom Town Centre Retail Study, and this seeks to identify an appropriate level of growth in retail provision in Epsom town centre. This is primarily a question of viability and target figures were not appraised in the initial appraisal of the Issues and Options with respect to retail although the principle is established in Policy CS14 of the Core Strategy. It is useful at this stage to consider whether higher or lower levels of development might have different sustainability attributes.

In the case of a higher target for retail development the key issue would be whether design solutions exists to ensure no adverse impacts with respect to flooding, traffic congestion and amenity and that there was no conflict between the need for land for retail and other uses. It may be the case that higher densities of development would support a more extensive and comprehensive approach to green infrastructure and renewable energy. There will be a cut off point at which the benefits of high density are outweighed by the disbenefits. It is noted that mixed use developments and developments adjacent to the town centre may include additional housing provision over and above the target level. The balance point may be a matter for the development control system to test within the guidance provided by Plan E.

In the case of less retail development it is considered that this would not maximise the potential benefits of the opportunity for mixed use redevelopment of the town centre. In particular, the benefits to sustainable transport and renewable energy may become more difficult to achieve with lower levels of retail provision. It also misses an opportunity to deliver new retail services in close proximity to other facilities and employment and where the majority of the population of the Borough can easily access them.

EPSOM TOWN CENTRE PLAN E

Policy E4: Town Centre Retail Area

Identifies the Town Centre's core shopping area.

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	O	O	O	Policy CS6 requires appropriate measures in development to address flooding. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be

				necessary.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	Redevelopment would address where this exists, although the policy would not directly influence this. See Policy CS1 and Policy CS6 of the Core Strategy
3) To ensure air quality continues to improve	0	0	0	Part of a strategy to ensure mixed use in the town centre and reduce the need to travel.
4) To reduce greenhouse gases	0	0	0	See Policy E8.
5) To reduce noise pollution	0	0	0	Seeks to retain town centre uses within the existing area that is recognised as the town centre. This may help limit the incidences where incompatible uses are adjacent to one another on the edge of the town centre. Also controlled by Policy CS6.
5) To reduce light pollution	0	0	0	As above.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	0	0	Policy CS3 encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	✓	✓	✓	Supports retention of retail employment within the boundary and redevelopment to improve vitality.
10) Make land available to meet the needs of the economy	0	0	0	Supports the maintenance of Epsom as a secondary regional centre.
11) Support economic growth which is inclusive, innovative and sustainable	✓	✓	✓	Supports Policy E3 in seeking to deliver sufficient retail space to support service provision in the town centre.
12) Balancing the needs for employment and housing to reduce	✓	✓	✓	Supports retention of current services and more effective, mixed

the need to travel				use of land at the most easily accessible location in the borough.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Compatible with the co-delivery of housing.
14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
15) To reduce poverty and social exclusion	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
16) To create and maintain safer and more secure communities	0	0	0	Policy CS5 and Policy CS14 of the Core Strategy require high quality design that delivers safe public and private environments.
17) To improve accessibility to all services and facilities	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
18) To make the best use of previously developed land and existing buildings	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	✓	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage. Much of the retail area is also designated as a Conservation Area
20) To reduce road congestion and the need to travel	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most

				easily accessible location in the borough.
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	Policy E8 encourages renewable energy. In addition to the provisions of Policy CS6 it is noted the town centre is an area of serious water stress. Site specific proposals also include measures.
22) To increase energy efficiency of new and existing development	0	0	0	
23) To increase the production and use of renewable energy	0	0	0	
Summary of key issues				
<p>The policy reinforces the objectives of Policy E1 and Policy E3 by defining a primary retail area and primary and secondary shopping frontages, and managing the uses in these areas. This can positively direct future retail growth to the most sustainable locations where it can have wider benefits for the whole of the town centre. It can also guide other essential town centre uses, such as restaurants and financial services, to the right location.</p>				

EPSOM TOWN CENTRE PLAN E				
Policy E5: Employment floorspace				
Identifies the role and future growth/scale of the town centre with respect to employment use.				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires appropriate measures to address flooding. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	✓	✓	✓	Redevelopment would address where this exists. See Policy CS1 and Policy CS6 of the Core Strategy
3) To ensure air quality continues to improve	0	✓	✓	Part of a strategy to ensure mixed use in the town centre and reduce the need to travel.

4) To reduce greenhouse gases	0	✓	✓	See Policy E8.
5) To reduce noise pollution	0	0	0	The boundary (Policy E1) seeks to retain town centre uses within the existing area that is recognised as the town centre. This may help limit the incidences where incompatible uses are adjacent to one another on the edge of the town centre. Also controlled by Policy CS6.
6) To reduce light pollution	0	0	0	As above.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	0	0	Policy CS3 encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	✓✓	✓✓	✓✓	Supports retention of employment within the boundary and redevelopment to improve vitality.
10) Make land available to meet the needs of the economy	✓✓	✓✓	✓✓	Supports the maintenance of Epsom as a secondary regional centre.
11) Support economic growth which is inclusive, innovative and sustainable	✓✓	✓✓	✓✓	Seeks to deliver sufficient employment space to support service provision in the town centre and a strategy to maximise the benefits of good accessibility.
12) Balancing the needs for employment and housing to reduce the need to travel	✓	✓	✓✓	Compatible with housing targets. Overall strategy seeks to achieve a balance.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Compatible with the co-delivery of housing.
14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	Supports retention of current services and more effective, mixed

				use of land at the most easily accessible location in the borough. Retains and seeks to increase employment opportunities
15) To reduce poverty and social exclusion	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
16) To create and maintain safer and more secure communities	0	0	0	Policy CS5 and Policy CS14 of the Core Strategy require high quality design that delivers safe public and private environments.
17) To improve accessibility to all services and facilities	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
18) To make the best use of previously developed land and existing buildings	✓✓	✓✓	✓✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough. May generate more trips to the town centre, but in the most sustainable locations with a range of transport options
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	Policy E8 encourages renewable energy. In addition to the

22) To increase energy efficiency of new and existing development	O	✓	✓	provisions of Policy CS6 it is noted the town centre is an area of serious water stress. Site specific proposals also include measures.
23) To increase the production and use of renewable energy	O	✓	✓	

Summary of key issues

The policy supports the maintenance of Epsom as a secondary regional centre and seeks to deliver sufficient employment space to support service provision in the town centre. It is compatible with housing targets and the overall strategy seeks to achieve a balance of uses at the most easily accessible location in the borough. The principal benefits are good accessibility and the potential to deliver more sustainable transport patterns. Other policies, notably Policy CS3, Policy CS6 and Policy E8 would ensure that new retail development makes a full contribution to wider sustainability issues.

The amount of employment space seeks to achieve an appropriate level of employment provision in Epsom town centre. This is primarily a question of viability and target figures were not appraised in the initial appraisal of the Issues and Options with respect to employment although the principle is established in Policy CS14 of the Core Strategy. It is useful at this stage to consider whether higher or lower levels of development might have different sustainability attributes.

In the case of a higher target for employment development the key issue would be whether design solutions exists to ensure no adverse impacts with respect to flooding, traffic congestion and amenity and that there was no conflict between the need for land for employment and other uses. It may be the case that higher densities of development would support a more extensive and comprehensive approach to green infrastructure and renewable energy. There will be a cut off point at which the benefits of high density are outweighed by the disbenefits. It is noted that mixed use developments and developments adjacent to the town centre may include additional housing provision over and above the target level. The balance point may be a matter for the development control system to test within the guidance provided by Plan E.

In the case of less employment development it is considered that this would not maximise the potential benefits of the opportunity for mixed use redevelopment of the town centre. In particular, the benefits to sustainable transport and renewable energy may become more difficult to achieve with lower levels of employment provision. It also misses an opportunity to deliver new employment provision in close proximity to other facilities and employment and where the majority of the population of the Borough can easily access them.

EPSOM TOWN CENTRE PLAN E

Policy E6: Leisure provision

Identifies the role and future growth/scale of the town centre with respect to employment use.

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	

1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires appropriate measures to address flooding. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	Redevelopment would address where this exists. See Policy CS1 and Policy CS6 of the Core Strategy
3) To ensure air quality continues to improve	0	0	✓	Part of a strategy to ensure mixed use in the town centre and reduce the need to travel.
4) To reduce greenhouse gases	0	0	✓	See Policy E8.
5) To reduce noise pollution	0	0	0	The boundary (Policy E1) seeks to retain town centre uses within the existing area that is recognised as the town centre. This may help limit the incidences where incompatible uses are adjacent to one another on the edge of the town centre. Also controlled by Policy CS6.
5) To reduce light pollution	0	0	0	As above.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	0	0	Policy CS3 encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	0	0	0	Supports retention of employment within the boundary and redevelopment to improve vitality. Retains current employment opportunities.
10) Make land available to meet the needs of the economy	0	0	0	Supports the maintenance of Epsom

				as a secondary regional centre.
11) Support economic growth which is inclusive, innovative and sustainable	✓	✓	✓	Supports service provision in the town centre and a strategy to maximise the benefits of good accessibility. Retention of leisure uses help makes the town centre attractive to employers
12) Balancing the needs for employment and housing to reduce the need to travel	✓	✓	✓	Compatible with housing targets. Overall strategy seeks to achieve a balance.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Compatible with the co-delivery of housing.
14) To facilitate the improved health and wellbeing of the whole population	✓✓	✓✓	✓✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough. Accessible leisure forms part of a wider strategy to promote healthy lifestyles.
15) To reduce poverty and social exclusion	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
16) To create and maintain safer and more secure communities	✓	✓	✓	Policy CS5 and Policy CS14 of the Core Strategy require high quality design that delivers safe public and private environments.
17) To improve accessibility to all services and facilities	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
18) To make the best use of previously developed land and existing buildings	✓	✓	✓	Supports retention of current services and more effective, mixed use of land at the most

				easily accessible location in the borough.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	✓	✓	✓	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	0	0	0	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough.
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	Policy E8 encourages renewable energy. In addition to the provisions of Policy CS6 it is noted the town centre is an area of serious water stress. Site specific proposals also include measures.
22) To increase energy efficiency of new and existing development	0	0	0	
23) To increase the production and use of renewable energy	0	0	0	
Summary of key issues				
Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough. Accessible leisure forms part of a wider strategy to promote healthy lifestyles.				

EPSOM TOWN CENTRE PLAN E				
Policy E7: Building height				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Measures to reduce run off during flash flooding may be necessary. This is addressed by Policy CS6. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	Supports opportunities to address contamination.
3) To ensure air quality continues to	0	0	0	High density development could

improve				lead to air quality problems related to traffic generation. Policies E10, 11, 12 and 13 and CS16 of the Cores Strategy address this
4) To reduce greenhouse gases	0	0	0	In addition to the comments above (SAO3), Policy CS6 and Policy E8 require energy efficiency and renewable energy.
5) To reduce noise pollution	?	?	?	Policy CS6 requires new development to address noise pollution.
5) To reduce light pollution	?	?	?	Policy CS6 requires new development to address light pollution.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires new development to address water pollution.
8) To conserve and enhance biodiversity within the plan area	0	0	0	Policy CS3 and Policy CS6 requires new development to contribute positively to biodiversity.
9) Provide for employment opportunities	0	0	0	Policy encourages the provision of employment at the most accessible location in the Borough.
10) Make land available to meet the needs of the economy	0	0	0	Seeks to maximise the use of previously developed land for mixed use, including employment.
11) Support economic growth which is inclusive, innovative and sustainable	0	0	0	Seeks effective use of pdl and is part of a broad strategy for mixed and balanced growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	0	0	Seeks effective use of pdl and is part of a broad strategy for mixed and balanced growth.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Part of a broad strategy to deliver housing in the town centre. See site specific proposals.

14) To facilitate the improved health and wellbeing of the whole population	?	?	?	Defining appropriate sites within the town centre can help preserve the character
15) To reduce poverty and social exclusion	0	0	0	
16) To create and maintain safer and more secure communities	0	0	0	Policy CS5 and Policy CS14 of the Core Strategy require high quality design that delivers safe public and private environments.
17) To improve accessibility to all services and facilities	0	0	0	Policy is part of a strategy to encourage the provision of services, employment and housing at the most accessible location in the Borough.
18) To make the best use of previously developed land and existing buildings	?	?	?	Seeks to maximise the use of previously developed land for mixed development, within the context of the surrounding area. This differs throughout the town centre
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	✓	✓	✓	The policy requires design that respects character, reinforcing Policy CS5 and Policy CS14 of the Core Strategy which require high quality design that protects and enhances heritage interests.
20) To reduce road congestion and the need to travel	?	?	?	Supports retention of current services and more effective, mixed use of land at the most easily accessible location in the borough. Transport policies E10 to 13 and CS16 also applicable.
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	Whilst other policies, notably Policy CS6, require sustainable design measures, the preparation of a corporate climate change strategy and an energy strategy will

				be key to delivering an integrated approach. Measures would be needed to balance the need for heating and cooling, addressing heavy rainfall and the town centre being in an area of serious water stress.
22) To increase energy efficiency of new and existing development	?	?	?	Policy CS6 requires sustainable design measures and E8 renewable energy. It can, however, be difficult to achieve required densities (for viability) and high Code for Sustainable Homes ratings.
23) To increase the production and use of renewable energy	?	?	?	Policy E8 requires renewable energy capacity and mixed use buildings provide an opportunity to do so efficiently.

Summary of key issues

The policy is key in the effective use of pdl and is part of a broad strategy for mixed and balanced growth. The policy will help to ensure that the use of PDL is appropriate in respect of the height of a development in relation to the surrounding character of the area. A prescriptive approach seeks to deliver the benefits of accessibility to services whilst controlling/avoiding adverse impacts such as traffic congestion, pollution and increasing flood risk.

Other policies provide an essential supplementary role by requiring flood risk (Policy CS6 of the Core Strategy; traffic (E10, E11, E12, E13 and CS16); air quality, noise and light (Policy CS6); open space (E9) and heritage (Policy CS5) to be taken into consideration.

Whilst other policies, notably Policy CS6, require sustainable design measures, the preparation of a corporate climate change strategy and an energy strategy will be key to delivering an integrated approach. These strategies can consider the need for heating and cooling and to address the consequences of heavy rainfall events.

EPSOM TOWN CENTRE PLAN E

Policy 8: Town Centre Energy Generation

Decentralised and renewable energy including CHP.

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	

1) To minimise the harm from flooding	0	0	0	No impact. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact.
3) To ensure air quality continues to improve	0	✓	✓	No impact would be experienced in Epsom town centre, but could help contribute to improvements in the wider area.
4) To reduce greenhouse gases	0	✓	✓	Substantial reductions in greenhouse gas emissions would be a priority.
5) To reduce noise pollution	0	0	0	No impact.
5) To reduce light pollution	0	0	0	No impact.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	No impact.
8) To conserve and enhance biodiversity within the plan area	0	0	0	No impact.
9) Provide for employment opportunities	0	0	0	Supports employment (green collar).and other uses
10) Make land available to meet the needs of the economy	0	0	0	Whilst large scale facilities may replace other uses, sufficient land is available to accommodate employment, retail, leisure and housing targets.
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	Renewable energy capacity is a key factor in delivering sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	0	0	No impact.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	✓	✓	Can help to address fuel poverty
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	
15) To reduce poverty and social	0	✓	✓	Potential cheaper energy source

exclusion				
16) To create and maintain safer and more secure communities	0	0	0	No impact.
17) To improve accessibility to all services and facilities	0	0	0	No impact.
18) To make the best use of previously developed land and existing buildings	0	0	0	No impact.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Could be a potential conflict between CHP/ renewable energy sources and the historic environment.
20) To reduce road congestion and the need to travel	0	0	0	No impact.
21) To ensure that the District is prepared for the impacts of climate change	0	✓	✓✓	Renewable energy capacity is a key factor in addressing the causes of climate change. In addition to the provisions of Policy CS6.
22) To increase energy efficiency of new and existing development	0	✓	✓✓	Renewable energy capacity can be a key factor in improving energy efficiency.
23) To increase the production and use of renewable energy	0	✓	✓✓	Co-ordinating developments and an appropriate mix of uses would support maximum benefits.
<p>Summary of issues</p> <p>Renewable energy capacity is a key factor in delivering sustainable economic growth and reducing greenhouse gas emissions.</p>				

EPSOM TOWN CENTRE PLAN E				
Policy E9: Public realm				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. A clear statement regarding the role of the Climate Change

				Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact.
3) To ensure air quality continues to improve	0	✓	✓	Vegetation can help improve air quality-green corridors
4) To reduce greenhouse gases	0	0	0	Renewable energy technologies can be incorporated into street furniture, but this a relatively minor contribution.
5) To reduce noise pollution	0	0	0	No impact.
5) To reduce light pollution	0	0	0	Policy CS6 requires control of light pollution.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires control of water pollution.
8) To conserve and enhance biodiversity within the plan area	0	✓	✓	Specifically seeks to deliver enhancement of biodiversity.
9) Provide for employment opportunities	0	0	0	No impact.
10) Make land available to meet the needs of the economy	0	0	0	No impact.
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	Co-ordination of the public realm supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	0	0	No impact.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	No impact.
14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	Co-ordination of the public realm supports health and wellbeing.
15) To reduce poverty and social exclusion	0	0	0	Policy CS16 requires access for all.
16) To create and maintain safer and more secure communities	✓	✓	✓	Policy CS5 and Policy CS14 of the Core Strategy require high quality design that delivers safe public and private environments. Civic

				pride
17) To improve accessibility to all services and facilities	✓	✓	✓	Improved legibility, permeability and attractiveness of the public realm is part of the strategy to improve access on foot.
18) To make the best use of previously developed land and existing buildings	0	0	0	High quality public realm helps facilitate high density development.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	✓	✓	✓	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	0	0	0	No impact.
21) To ensure that the District is prepared for the impacts of climate change	0	✓	✓	Greener public space is a key element in ensuring shelter during extreme heat or rain.
22) To increase energy efficiency of new and existing development	0	0	0	
23) To increase the production and use of renewable energy	0	0	0	

Summary of issues

Co-ordination of the public realm supports sustainable economic growth and well being of the community through the creation of attractive, versatile and enjoyable public spaces and can ensure compatibility with heritage interests. Quality design in the public realm helps facilitate high density development. Improved legibility, permeability and attractiveness of the public realm form a key part of the strategy to improve access on foot.

The use of green building techniques and a green infrastructure approach can deliver a more gentle transition from urban forms to a more natural environment. The use of SUDS and natural materials can promote improved water quality and opportunities can be identified to enhance biodiversity.

A number of actions were proposed at the Issues and Options Paper with a view to delivering improvements to the public realm and these were appraised at that time. It was considered that all were potentially appropriate, but a number of issues emerged with respect to how Plan E could avoid adverse impacts and maximise benefits to sustainability. These included compatibility with heritage interests, safety, legibility, permeability and access for all and minimising light pollution. In this respect Policy E9 is supported by other policies, notably Policy CS6 which requires consideration of flood risk and pollution; and Policy CS5 which requires protection and enhancement of heritage interests. Whilst Policy E8 requires renewable energy capacity, an overarching statement or commitment to a climate change/energy strategy may strengthen the position and likelihood of delivery. This can be explored in the Delivery DPD and in the corporate Climate Change Strategy. The issues covered should include flooding, energy and green infrastructure.

EPSOM TOWN CENTRE PLAN E				
Policy E10: Cycling				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	Redevelopment would address where this exists. See Policy CS1 and Policy CS6 of the Core Strategy.
3) To ensure air quality continues to improve	✓	✓	✓	A key policy to help improve air quality.
4) To reduce greenhouse gases	✓	✓	✓	A key policy to help reduce emissions.
5) To reduce noise pollution	✓	✓	✓	A quiet form of transport.
6) To reduce light pollution	0	0	0	
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	
8) To conserve and enhance biodiversity within the plan area	0	0	0	
9) Provide for employment opportunities	0	0	0	Supports access to employment areas in town by cycle.
10) Make land available to meet the needs of the economy	0	0	0	No impact
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	Increasing cycling and reducing car travel is a key measure in ensuring sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	0	0	No impact.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	

14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	A healthy means of transport.
15) To reduce poverty and social exclusion	0	✓	✓	Improved access for all.
16) To create and maintain safer and more secure communities	0	0	0	
17) To improve accessibility to all services and facilities	✓	✓	✓	The management of traffic to promote alternatives to the car is a key factor in securing equitable access to opportunities.
18) To make the best use of previously developed land and existing buildings	0	0	0	No impact.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	No impact.
20) To reduce road congestion and the need to travel	✓	✓	✓	The management of traffic is a key factor to reducing congestion.
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	
22) To increase energy efficiency of new and existing development	0	0	0	No impact.
23) To increase the production and use of renewable energy	0	0	0	No impact.
<p>Summary of key issues</p> <p>A number of actions proposed in the Issues and Options Paper with a view to delivering transport and accessibility objectives. The options were not mutually exclusive and the key issues arising were to reduce congestion, improve air quality, reduce greenhouse emissions, safer town centre, and protect and enhance heritage and character. Increasing cycling and reducing car travel is a key measure in ensuring sustainable economic growth. Cycling as an alternative to the car promoted healthy lifestyles and supports equitable access to opportunities.</p> <p>Policy E10 is supplemented by E9 and Policy CS5 which seek to protect and enhance heritage.</p>				

EPSOM TOWN CENTRE ISSUES AND OPTION PAPER (informs commentary for Policy E11, Policy E12 and Policy E13)

Movement, transport and accessibility: in addition to the three strategic options identified for managing the existing highway network there are a number of other actions. Appraisal can inform the selection, combination and further refinement of actions, but it is not of any benefit

to appraise each individual option/proposal.

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	No impact. A clear statement regarding the role of the Climate Change Strategy and Delivery Plan DPD may be necessary.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact.
3) To ensure air quality continues to improve	✓	✓	✓	The management of traffic is a key factor in improving air quality.
4) To reduce greenhouse gases	✓	✓	✓	The management of traffic is a key factor in reducing greenhouse emissions.
5) To reduce noise pollution	0	0	0	No significant impact.
5) To reduce light pollution	0	0	0	No impact.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	No impact.
8) To conserve and enhance biodiversity within the plan area	0	0	0	No impact.
9) Provide for employment opportunities	0	0	0	No impact.
10) Make land available to meet the needs of the economy	0	0	0	No impact.
11) Support economic growth which is inclusive, innovative and sustainable	?	?	?	The management of traffic to reduce congestion is a key factor in delivering sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	0	0	Changes to South Street could reduce journey times for those using the town centre road network
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	No impact.
14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	More efficient journeys and improved accessibility, potentially reducing the amount of cars

				passing through the market place
15) To reduce poverty and social exclusion	0	0	0	No impact
16) To create and maintain safer and more secure communities	0	0	0	The management of traffic to promote alternatives to the car is a key factor in delivering a safer town centre.
17) To improve accessibility to all services and facilities	✓	✓	✓	The management of traffic to promote alternatives to the car is a key factor in securing equitable access to opportunities.
18) To make the best use of previously developed land and existing buildings	0	0	0	No impact.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	?	?	?	Solutions should seek to protect and enhance heritage and character.
20) To reduce road congestion and the need to travel	✓	✓	✓	The management of traffic is a key factor to reducing congestion, although this policy will not help reduce the need to travel.
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	
22) To increase energy efficiency of new and existing development	0	0	0	Traffic management should support the most energy efficient solutions.
23) To increase the production and use of renewable energy	0	0	0	Traffic management should support renewable energy solutions.
<p>The management of traffic to reduce congestion is a key factor in delivering sustainable economic growth and can make a substantial contribution to improving air quality and reducing greenhouse emissions.</p> <p>The management of traffic can promote equitable access to opportunities and a safer town centre. Solutions should seek to protect and enhance heritage and character and support the most energy efficient solutions and the development of renewable energy solutions.</p>				

Policy E14: Depot Road and Upper High Street				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	✓	✓	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. Proposed uses appropriate to level of flood risk in Town Centre. Surface water management a specific requirement of development.
2) To reduce land contamination and safeguard soil quality and quantity	?	?	?	Part of the site has been identified as having potential contamination.
3) To ensure air quality continues to improve	0	✓	✓	Part of the strategy to reduce the need to travel through mixed town centre use and to provide development where it can be accessed by rail, bus, foot or cycle.
4) To reduce greenhouse gases	0	✓	✓	On site decentralised CHP.
5) To reduce noise pollution	?	?	?	Retains appropriate uses within town centre.
6) To reduce light pollution	0	0	0	Policy CS6 seeks to ensure light pollution is minimised.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	✓	✓	Policy C3 encourages measures to enhance biodiversity in all development. The policy seeks to include native species
9) Provide for employment opportunities	0	✓	✓	Provision of retail space and medical centre. Relocation of existing uses (on site?).
10) Make land available to meet the needs of the economy	0	✓	✓	Provision of retail space and medical centre. Relocation of existing business uses

				(on site).
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	✓	✓	Retail employment and housing to be provided.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	✓✓	✓✓	Affordable housing and homelessness prevention flats to be provided.
14) To facilitate the improved health and wellbeing of the whole population	0	✓	✓	Services, employment and housing complemented by traffic calming and green environment.
15) To reduce poverty and social exclusion	0	✓	✓	Improving provision for cycling and walking can promote social inclusion. Affordable housing and homelessness prevention flats to be provided.
16) To create and maintain safer and more secure communities	0	✓	✓	Traffic calming and improved provision for pedestrians.
17) To improve accessibility to all services and facilities	0	✓	✓	Mixed uses in accessible location.
18) To make the best use of previously developed land and existing buildings	0	✓✓	✓✓	Mixed use and higher density. Supplemented by Policy E7 on building height.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	0	?	?	Mixed uses in accessible location. Improvements for pedestrian access and cycling. May create a local destination and increase travel
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the

				production of the Delivery DPD.
22) To increase energy efficiency of new and existing development	0	✓	✓	Policy CS6 of the Core Strategy requires sustainable design.
23) To increase the production and use of renewable energy	0	✓	✓	On site decentralised chp.
<p>Summary of issues</p> <p>Redevelopment of this area would retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing and homelessness prevention flats, at a location with good accessibility. The enhancement of the public realm would be a key factor with the retention of trees, landscaping and improvements for pedestrians. On site decentralised chp and sustainable design (Policy CS6 of the Core Strategy) would be required. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD.</p>				

EPSOM TOWN CENTRE PLAN E				
Policy E15: The Utilities Site and East Street				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	✓	✓	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. A small part of the site falls within a critical drainage area, which is recognised in the policy. Proposed uses appropriate to level of flood risk in Town Centre.
2) To reduce land contamination and safeguard soil quality and quantity	0	✓	✓	Development is dependent on the current use for gas holding vacating the site.
3) To ensure air quality continues to improve	?	?	?	Part of the strategy to reduce the need to travel through mixed town centre use and to provide development where it can be accessed by rail, bus,

				foot or cycle. Some loss of existing open space
4) To reduce greenhouse gases	0	0	0	On site decentralised chp will help to mitigate the effect of additional energy dependent development.
5) To reduce noise pollution	?	?	?	Development close to railway line, but with mitigation planned. Retains appropriate uses within town centre.
5) To reduce light pollution	x	x	x	Low levels of lighting currently on site, development likely to result in greater light pollution.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	0	✓	Policy CS3 encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	0	✓✓	✓✓	Provision of employment uses.
10) Make land available to meet the needs of the economy	0	✓✓	✓✓	Employment uses.
11) Support economic growth which is inclusive, innovative and sustainable	0	✓✓	✓✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	✓✓	✓✓	Employment, services and housing to be provided.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	✓✓	✓✓	Affordable housing.
14) To facilitate the improved health and wellbeing of the whole population	0	✓	✓	Services, employment and housing complemented by traffic calming and green environment. Development is dependent on the current use for gas holding vacating the

				site.
15) To reduce poverty and social exclusion	0	✓	✓	Improving provision for cycling and walking can promote social inclusion. Affordable housing and homelessness prevention flats to be provided.
16) To create and maintain safer and more secure communities	0	✓	✓	Traffic calming and improved provision for pedestrians. Development is dependent on the current use for gas holding vacating the site.
17) To improve accessibility to all services and facilities	0	✓	✓	Mixed uses in accessible location.
18) To make the best use of previously developed land and existing buildings	0	✓✓	✓✓	Mixed use and higher density. Supplemented by Policy E7 on building height.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	0	x	x	Site does not currently generate traffic and significant levels of development proposed which can only be partially mitigated.
21) To ensure that the District is prepared for the impacts of climate change	0	0	0	A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD.
22) To increase energy efficiency of new and existing development	0	✓	✓	Policy CS6 of the Core Strategy requires sustainable design.
23) To increase the production and use of renewable energy	0	✓	✓	On site decentralised chp.
Summary of issues				
Redevelopment of this area would retain and increase appropriate uses within town centre,				

providing employment, community services and housing, including affordable housing, at a location with good accessibility. The enhancement of the public realm would be a key factor with the retention of trees, landscaping and improvements for pedestrians. On site decentralised chp and sustainable design (Policy CS6 of the Core Strategy) would be required. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD.

Development is dependent on the current use for gas holding vacating the site.

EPSOM TOWN CENTRE PLAN E				
Policy E16: Epsom Station				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	O	O	O	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. Proposed uses appropriate to level of flood risk
2) To reduce land contamination and safeguard soil quality and quantity	O	✓	✓	Part of the site as been identified as having potential contamination
3) To ensure air quality continues to improve	O	?	?	A key part of the strategy to reduce the need to travel through mixed town centre use and to provide development where it can be accessed by rail, bus, foot or cycle.
4) To reduce greenhouse gases	O	✓	✓	On site decentralised chp.
5) To reduce noise pollution	?	?	?	Potential issues of residential development near to the railway line, not withstanding mitigation. Potential canyon effect in Station Approach.
5) To reduce light pollution	O	x	x	Policy CS6 seeks to control light pollution. Potential negative impact of higher development compared to current station building

7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	✓	✓	Policy CS3 encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	0	✓	✓	Provision of employment uses.
10) Make land available to meet the needs of the economy	0	✓	✓	Commercial uses to be on site.
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	✓✓	✓✓	Employment, services and housing to be provided.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	✓✓	✓✓	Affordable housing to be provided.
14) To facilitate the improved health and wellbeing of the whole population	0	✓	✓	Services, employment and housing complemented by traffic calming and green environment.
15) To reduce poverty and social exclusion	0	✓	✓	Affordable flats to be provided
16) To create and maintain safer and more secure communities	0	✓	✓	Traffic calming and improved provision for pedestrians.
17) To improve accessibility to all services and facilities	0	✓✓	✓✓	Mixed uses in accessible location.
18) To make the best use of previously developed land and existing buildings	0	✓✓	✓✓	Mixed use and higher density. Supplemented by Policy E7 on building height.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	0	✓	✓	Mixed uses in highly accessible location. Improvements for pedestrian access and cycling.
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	A more holistic and prescriptive approach to achieving high standards of

				sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD.
22) To increase energy efficiency of new and existing development	0	✓	✓	Policy CS6 of the Core Strategy requires sustainable design.
23) To increase the production and use of renewable energy	0	✓	✓	On site decentralised chp.

Summary of issues

Redevelopment of this area would retain and increase appropriate uses within town centre, providing employment, community services and housing, including affordable housing at the site with the best accessibility in the Borough. A new station would help improve the attractiveness of train travel. The enhancement of the public realm would be a key factor with the retention of trees, landscaping and improvements for pedestrians. On site decentralised chp and sustainable design (Policy CS6 of the Core Strategy) would be required. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD.

EPSOM TOWN CENTRE PLAN E				
Policy E17: Other opportunity sites (Comrades Club, The Parade)				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	?	?	?	Part of the site falls within the Critical Drainage Area. The Surface Water Management Plan should help identify any mitigation measures. Potential improvement
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact
3) To ensure air quality continues to improve	?	?	?	Development of this site will intensify its use, although the requirement of a Travel Plan should help to mitigate any impact. Parking provision on site

				should be minimal to reflect the highly sustainable location
4) To reduce greenhouse gases	0	0	0	No significant impact
5) To reduce noise pollution	0	0	0	Intensifying the uses on this site may increase noise pollution. Unlikely to be any significant conflict between the uses proposed
5) To reduce light pollution	0	0	0	Unlikely to be any significant change
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Unlikely to be any significant change
8) To conserve and enhance biodiversity within the plan area	0	0	0	Unlikely to be any significant change
9) Provide for employment opportunities	✓	✓	✓	Employment opportunities to be provided
10) Make land available to meet the needs of the economy	✓	✓	✓	Employment opportunities to be provided
11) Support economic growth which is inclusive, innovative and sustainable	✓	✓	✓	Employment opportunities to be provided
12) Balancing the needs for employment and housing to reduce the need to travel	?	?	?	Site will provide some employment uses although should a hotel be on the site, this will encourage travel. However, with a variety of sustainable transport choices, the town centre is considered a suitable location for hotels
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	No impact
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	No impact. Re-provision of social club facilities
15) To reduce poverty and social exclusion	0	0	0	No impact
16) To create and maintain safer and more secure communities	0	0	0	No significant impacts identified
17) To improve accessibility to all services and facilities	0	0	0	Site is in a sustainable location

18) To make the best use of previously developed land and existing buildings	✓	✓	✓	Making more efficient use of PDL
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	?	?	?	Site is within an area of archaeological potential.
20) To reduce road congestion and the need to travel	0	0	0	Should a hotel be on the site, then it will encourage travel. However, with a variety of sustainable transport choices, the town centre is considered a suitable location for hotels
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	Unknown
22) To increase energy efficiency of new and existing development	0	0	0	No impact
23) To increase the production and use of renewable energy	0	0	0	No impact
Summary of issues				
The development of this site would intensify its use, making more efficient use of PDL. The policy should ensure that the existing leisure facilities are re-provided and careful consideration needs to be given to in site parking. This should be minimal due to the sites sustainable location.				

EPSOM TOWN CENTRE PLAN E				
Policy E17: Other opportunity sites (Emergency services site, Church Street)				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	No significant impact
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact
3) To ensure air quality continues to improve	?	?	?	Development of this site will intensify its use, although the requirement of a Travel Plan should help to mitigate any impact. Parking provision on site should be minimal to reflect the highly

				sustainable location
4) To reduce greenhouse gases	0	0	0	No significant impact
5) To reduce noise pollution	?	?	?	Developing this site for the uses suggested may reduce noise pollution (considering the site is currently used by the emergency services)
5) To reduce light pollution	0	0	0	Unlikely to be any significant change
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Unlikely to be any significant change
8) To conserve and enhance biodiversity within the plan area	0	0	0	Unlikely to be any significant change
9) Provide for employment opportunities	0	0	0	Unlikely to be any significant change
10) Make land available to meet the needs of the economy	0	0	0	Unlikely to be any significant change, although this is dependent on the emergency services being relocated.
11) Support economic growth which is inclusive, innovative and sustainable	0	0	0	Unlikely to be any significant change
12) Balancing the needs for employment and housing to reduce the need to travel	?	?	?	Site will provide some housing and being in a sustainable location, parking provision should be restricted
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	✓	✓	✓	The site will make a contribution to the Borough's housing target and will also make some affordable provision
14) To facilitate the improved health and wellbeing of the whole population	✓	✓	✓	Should the need for community facilities be identified following the relocation / colocation of the emergency services, then the site should provide this
15) To reduce poverty and social exclusion	0	0	0	No impact
16) To create and maintain safer and more secure communities	0	0	0	No significant impacts identified

17) To improve accessibility to all services and facilities	0	0	0	Site is in a sustainable location
18) To make the best use of previously developed land and existing buildings	✓	✓	✓	Making more efficient use of PDL
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Development of the site should take account of the adjacent conservation area
20) To reduce road congestion and the need to travel	0	0	0	Being in a sustainable location, parking provision should be restricted
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	Unknown
22) To increase energy efficiency of new and existing development	0	0	0	No impact
23) To increase the production and use of renewable energy	0	0	0	No impact
Summary of issues				
<p>The development of this site would intensify its use, making more efficient use of PDL. The policy makes provision for a community use to be retained on part of the site should the need be identified following the relocation / colocation of the existing emergency services. Careful consideration needs to be given to in site parking. This should be minimal due to the sites sustainable location.</p>				

EPSOM TOWN CENTRE PLAN E				
Policy E17: Other opportunity sites. Global House, Ashley Avenue				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. Proposed uses appropriate to level of flood risk in Town Centre. Surface water issues would need to be considered
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact
3) To ensure air quality continues to improve	0	0	✓	The provision of a green travel plan

4) To reduce greenhouse gases	0	0	✓	The provision of a green travel plan
5) To reduce noise pollution	0	0	0	Retains appropriate uses within town centre.
6) To reduce light pollution	0	0	0	No impact
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	✓	✓	✓	Policy encourages measures to enhance biodiversity.
9) Provide for employment opportunities	✓	✓	✓	Provision of improved and additional employment uses
10) Make land available to meet the needs of the economy	✓	✓	✓	Provision of additional space for employment uses
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	0	0	Residential uses are not considered appropriate in this location, although other commercial uses may be appropriate (as a contingency plan)
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Residential uses are not considered appropriate in this location
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	Good access to town centre.
15) To reduce poverty and social exclusion	0	0	0	The opportunity at this site will help to reduce the reliance upon job opportunities beyond the Borough boundary
16) To create and maintain safer and more secure communities	0	✓	✓	Vacant buildings have a negative impact.
17) To improve accessibility to all services and facilities	0	0	0	This is a highly accessible location for commercial office provision
18) To make the best use of previously developed land and existing buildings	0	✓	✓✓	Refurbishment or redevelopment of partially vacant building
19) To protect, enhance the natural,				Vacant commercial

archaeological, historic environments and cultural assets	0	✓	✓	buildings have a negative impact. Area of archaeological potential.
20) To reduce road congestion and the need to travel	0	✓	✓	Mixed uses in accessible location and requirement for a Green Travel Plan
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Green Travel Plan.
22) To increase energy efficiency of new and existing development	0	0	0	Policy CS6 of the Core Strategy requires sustainable design.
23) To increase the production and use of renewable energy	0	0	0	Policy E8 requires renewable energy capacity.

Summary of issues

This is a partially occupied commercial office building that forms the southern extent of the Ashley Centre shopping complex. The site is in a highly accessible location for employment uses. The site offers an opportunity to help meet employment needs and reduce commuting beyond the borough boundary for work. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Consideration could be given to whether greenhouse emissions could most effectively be reduced by funding retrofitting of existing buildings.

EPSOM TOWN CENTRE PLAN E

Policy E17: Other opportunity sites. Magistrates and County court site, The Parade/ Ashley Road

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires consideration of flood

				risk. Proposed uses appropriate to level of flood risk in Town Centre. The site falls within the 'critical drainage area' identified in the SFRA, and would need to mitigate against any surface water flooding issues present.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact
3) To ensure air quality continues to improve	0	0	✓	The provision of a green travel plan
4) To reduce greenhouse gases	0	0	✓	Part of a strategy to ensure mixed use in the town centre and reduce the need to travel. The provision of a green travel plan
5) To reduce noise pollution	0	0	0	Retains appropriate uses within town centre.
6) To reduce light pollution	0	0	0	
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	✓	✓	✓	Policy encourages measures to enhance biodiversity.
9) Provide for employment opportunities	✓	✓	✓	Provision of improved employment uses
10) Make land available to meet the needs of the economy	✓	✓	✓	Provision of land for employment uses
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	✓	✓	✓	Mixed use development in the town centre
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	✓	✓	At least 24 affordable units to be delivered as part of housing element
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	Possible healthcare provisions on ground floor. Good access to

				town centre.
15) To reduce poverty and social exclusion	0	0	0	Provision of an element of affordable housing
16) To create and maintain safer and more secure communities	0	✓	✓	Vacant buildings have a negative impact.
17) To improve accessibility to all services and facilities	0	✓	✓	Mixed uses in accessible location.
18) To make the best use of previously developed land and existing buildings	✓	✓	✓✓	Refurbishment or redevelopment of vacant building
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	✓	✓	✓	Vacant commercial buildings have a negative impact. Area of archaeological potential.
20) To reduce road congestion and the need to travel	0	0	✓	Mixed uses in accessible location and requirement for a Green Travel Plan
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Green Travel Plan.
22) To increase energy efficiency of new and existing development	0	0	0	Policy CS6 of the Core Strategy requires sustainable design.
23) To increase the production and use of renewable energy	0	0	0	Policy E8 requires renewable energy capacity.

Summary of issues

This is an edge of town centre site comprising the vacant Epsom magistrates and County Courts. The site falls within the 'critical drainage area' identified in the SFRA. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Consideration could be given to whether greenhouse emissions could most effectively be reduced by funding retrofitting of existing buildings.

EPSOM TOWN CENTRE PLAN E

Policy E17: Other opportunity sites. The Market Place, High Street

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. Proposed uses appropriate to level of flood risk in Town Centre.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact
3) To ensure air quality continues to improve	0	0	0	No direct effect
4) To reduce greenhouse gases	0	0	0	Part of a strategy to ensure mixed use in the town centre and reduce the need to travel.
5) To reduce noise pollution	0	0	0	Retains appropriate uses within town centre.
6) To reduce light pollution	0	0	x	Policy CS6 seeks to ensure light pollution is minimised. More open air events may increase light pollution in the long term- would need to be mitigated against. This area is highly commercial with very little residential, making it an appropriate location for such events. .
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	✓	✓	✓	Policy encourages measures to enhance biodiversity.
9) Provide for employment opportunities	0	0	0	No direct impact, but will encourage the vitality and viability of the town centre.

10) Make land available to meet the needs of the economy	0	0	0	No additional employment land, but making the most efficient use of the existing land will contribute towards the needs of the economy.
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	0	0	
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Affordable housing to be provided.
14) To facilitate the improved health and wellbeing of the whole population	0	✓	✓	Traffic calming and green environment.
15) To reduce poverty and social exclusion	0	✓	✓	Cultural and community events in accessible locations.
16) To create and maintain safer and more secure communities	0	✓	✓	Traffic calming and improved provision for pedestrians.
17) To improve accessibility to all services and facilities	0	✓	✓	Mixed uses in accessible location.
18) To make the best use of previously developed land and existing buildings	0	✓	✓	The de-designation of highway status on the Market Place will ensure the most efficient use of this public space
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	✓	✓	✓✓	Any changes to the marketplace are required to maintain it's historic character and appearance.
20) To reduce road congestion and the need to travel	0	0	0	Mixed uses in accessible location. Improvements for pedestrian access and cycling.
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the

				Delivery DPD.
22) To increase energy efficiency of new and existing development	0	0	0	Policy CS6 of the Core Strategy requires sustainable design.
23) To increase the production and use of renewable energy	0	0	0	Policy E8 requires renewable energy capacity.
<p>Summary of issues</p> <p>The enhancement of the public realm would be a key factor with the retention of trees, landscaping and improvements for pedestrians. The enhancement of the historic character of the Market Place is a priority for Plan E. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Consideration could be given to whether greenhouse emissions could most effectively be reduced by funding retrofitting of existing buildings.</p>				

EPSOM TOWN CENTRE PLAN E				
Policy E17: Other opportunity sites. Pickard House, Upper High Street				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. Proposed uses appropriate to level of flood risk in Town Centre.
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact
3) To ensure air quality continues to improve	0	0	0	No direct effect
4) To reduce greenhouse gases	0	0	0	Part of a strategy to ensure mixed use in the town centre and reduce the need to travel.
5) To reduce noise pollution	0	0	0	Retains appropriate uses within town centre.
6) To reduce light pollution	0	0	0	
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to

				address pollution.
8) To conserve and enhance biodiversity within the plan area	✓	✓	✓	Policy encourages measures to enhance biodiversity.
9) Provide for employment opportunities	✓	✓	✓	Provision of improved employment uses
10) Make land available to meet the needs of the economy	✓	✓	✓	Provision of improved employment uses
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	✓	✓	✓	Mixed use development in the town centre
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	✓	✓	Housing considered appropriate for upper floors
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	
15) To reduce poverty and social exclusion	0	0	0	
16) To create and maintain safer and more secure communities	0	✓	✓	Vacant commercial buildings have a negative impact.
17) To improve accessibility to all services and facilities	0	✓	✓	Mixed uses in accessible location.
18) To make the best use of previously developed land and existing buildings	✓	✓	✓✓	Refurbishment or redevelopment of vacant building
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	✓	✓	✓✓	Vacant commercial buildings have a negative impact, and bringing this building back into use will improve the historic character and appearance of the conservation area.
20) To reduce road congestion and the need to travel	0	0	0	Mixed uses in accessible location.
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the

				production of the Delivery DPD.
22) To increase energy efficiency of new and existing development	0	0	0	Policy CS6 of the Core Strategy requires sustainable design.
23) To increase the production and use of renewable energy	0	0	0	Policy E8 requires renewable energy capacity.
<p>Summary of issues</p> <p>Pickard House is a vacant office building in Upper High Street that acts as an important gateway into the town, clearly marking the transition between commercial and residential uses in the town centre. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Consideration could be given to whether greenhouse emissions could most effectively be reduced by funding retrofitting of existing buildings.</p>				

EPSOM TOWN CENTRE PLAN E				
Policy E17: Other opportunity sites (Land to the rear of The Albion Public House, South Street)				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	No significant impact
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact
3) To ensure air quality continues to improve	?	?	?	Development of this site will intensify it's use, although the requirement of a Travel Plan should help to mitigate any impact. Parking provision on site should be minimal to reflect the highly sustainable location
4) To reduce greenhouse gases	0	0	0	No significant impact
5) To reduce noise pollution	0	0	0	No significant impact. Adjoining uses will have to be considered

5) To reduce light pollution	0	0	0	Unlikely to be any significant change
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Unlikely to be any significant change
8) To conserve and enhance biodiversity within the plan area	0	0	0	Unlikely to be any significant change
9) Provide for employment opportunities	✓	✓	✓	Employment opportunities to be re-provided
10) Make land available to meet the needs of the economy	✓	✓	✓	Employment opportunities to be re-provided
11) Support economic growth which is inclusive, innovative and sustainable	✓	✓	✓	Employment opportunities to be re-provided
12) Balancing the needs for employment and housing to reduce the need to travel	✓	✓	✓	Site will provide a mix of uses including both housing and employment
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	✓	✓	✓	Site will make a small contribution towards meeting the Borough's affordable housing need
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	No impact
15) To reduce poverty and social exclusion	0	0	0	A small contribution toward affordable housing
16) To create and maintain safer and more secure communities	0	0	0	No significant impacts identified
17) To improve accessibility to all services and facilities	0	0	0	No significant impacts, although site is in a sustainable location
18) To make the best use of previously developed land and existing buildings	✓	✓	✓	Making more efficient use of PDL
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	?	?	?	Site is within an area of archaeological potential. Site is also within the conservation area.
20) To reduce road congestion and the need to travel	0	0	0	No significant impacts, although site is in a sustainable location
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	Unknown
22) To increase energy efficiency of	0	0	0	No impact

new and existing development				
23) To increase the production and use of renewable energy	0	0	0	No impact
Summary of issues				
Land to the rear of The Albion Public House, South Street)				
The development of this site would intensify its use, making more efficient use of PDL. Design will be very important to ensure new development complements and enhances the conservation area. Parking provision on the site should be minimal to reflect its sustainable location.				

EPSOM TOWN CENTRE PLAN E				
Policy E17: Other opportunity sites. TK Maxx store				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. Proposed uses appropriate to level of flood risk in Town Centre. Surface water issues would need to be considered
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	The site has been identified as having potential contamination
3) To ensure air quality continues to improve	0	0	0	
4) To reduce greenhouse gases	0	0	0	
5) To reduce noise pollution	0	0	x	Possible increased noise through higher density uses. Retains appropriate uses within town centre.
6) To reduce light pollution	0	0	x	Possible increased light pollution through higher density and residential uses.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	✓	✓	✓	Policy encourages measures to enhance biodiversity.

9) Provide for employment opportunities	0	0	0	Retail uses protected
10) Make land available to meet the needs of the economy	0	0	0	Provision of additional space for employment uses
11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	✓	✓	Residential uses are not considered appropriate in this location, although other commercial uses may be appropriate (as a contingency plan)
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	✓	✓	At least 26 affordable homes
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	Good access to town centre.
15) To reduce poverty and social exclusion	0	0	0	The opportunity at this site will help to reduce the reliance upon job opportunities beyond the Borough boundary
16) To create and maintain safer and more secure communities	0	0	0	Residential offers natural surveillance
17) To improve accessibility to all services and facilities	0	✓	✓	Mixed uses in accessible location.
18) To make the best use of previously developed land and existing buildings	0	✓	✓✓	Refurbishment or redevelopment of partially vacant building
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	✓	✓	Area of archaeological potential. The Conservation Appraisal states that the existing buildings could be replaced by better designed buildings in the future
20) To reduce road congestion and the need to travel	0	✓	✓	Mixed uses in accessible location and requirement for a Green Travel Plan
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure

				may be necessary ahead of the production of the Delivery DPD. Green Travel Plan.
22) To increase energy efficiency of new and existing development	O	O	O	Policy CS6 of the Core Strategy requires sustainable design.
23) To increase the production and use of renewable energy	O	O	O	Policy E8 requires renewable energy capacity.

Summary of issues

This is a prominent site located at the heart of the town centre's main shopping area. The retail use forms part of the primary retail frontage and there is commercial and leisure on upper floors. The site is in a highly accessible location. The site offers an opportunity to help meet residential needs. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Consideration could be given to whether greenhouse emissions could most effectively be reduced by funding retrofitting of existing buildings.

EPSOM TOWN CENTRE PLAN E				
Policy E17: Other opportunity sites (Town Hall Square and car park, rear of Town Hall)				
Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	?	?	?	Part of the town hall car park is within the critical drainage area and this is acknowledged in the policy. The Surface Water Management Plan will help to identify measures to address this. Potentially has a positive impact.
2) To reduce land contamination and safeguard soil quality and quantity	O	O	O	No impact
3) To ensure air quality continues to improve	✓	✓	✓	Improvement of this site will help to facilitate rear servicing

				to some of the premises along High Street (east). Servicing these premises currently is a cause of congestion so improving this situation should help to improve the flow of traffic thus helping to improve air quality.
4) To reduce greenhouse gases	0	0	0	Marginal benefits
5) To reduce noise pollution	0	0	0	No impact
5) To reduce light pollution	0	0	0	Unlikely to be any significant change
7) To maintain and improve the water quality of the rivers and groundwater	?	?	?	If permeable paving is used there may be potential implications
8) To conserve and enhance biodiversity within the plan area	0	0	0	Unlikely to be any significant change although there could be the potential for more tree planting
9) Provide for employment opportunities	0	0	0	No impact
10) Make land available to meet the needs of the economy	0	0	0	Parking provision is being retained which is helping meet the needs of the local economy, although there is to be no increase
11) Support economic growth which is inclusive, innovative and sustainable	0	0	0	No impact
12) Balancing the needs for employment and housing to reduce the need to travel	x	x	x	Providing parking spaces does not reduce the need to travel, but facilitates it. However, there is to be no increase in provision and it is important the town centre remains accessible by all forms of transport
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	No impact
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	No impact

15) To reduce poverty and social exclusion	0	0	0	No impact
16) To create and maintain safer and more secure communities	✓	✓	✓	Through improving this public space, safety should be improved, however the potential conflict between pedestrians and servicing vehicles should be considered at the design stage
17) To improve accessibility to all services and facilities	✓	✓	✓	Improving rear access for servicing vehicles
18) To make the best use of previously developed land and existing buildings	0	0	0	No significant impact
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	?	?	?	Site is within an area of archaeological potential
20) To reduce road congestion and the need to travel	?	?	?	Providing parking spaces does not reduce the need to travel, but facilitates it. However, there is to be no increase in provision and it is important the town centre remains accessible by all forms of transport. Providing access to rear servicing should help to reduce congestion, if used.
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	Potential if permeable surfaces are used, but no mention of this in policy
22) To increase energy efficiency of new and existing development	0	0	0	No impact
23) To increase the production and use of renewable energy	0	0	0	No impact
<p>Summary of issues</p> <p>The area currently operates as a car park and the aim of the policy is to make this area a more useable public space, which has the primary function of being a car park. Additionally, the aim is to facilitate rear servicing to the premises on the southern side of High St (east). Overall the use of the site remains the same, although the provision of rear servicing should help improve traffic circulation. There is potential for permeable surfacing although this will need to be investigated due to the potential impact on the groundwater.</p>				

EPSOM TOWN CENTRE PLAN E

Policy E17: Other opportunity sites (Former Woolworths Store, High Street (east))

Sustainability Appraisal Objectives	Assessment			Comments/ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1) To minimise the harm from flooding	0	0	0	Policy CS6 of the Core Strategy DPD requires consideration of flood risk. Site in Critical drainage area, will require FRA if increasing the footprint (not likely)
2) To reduce land contamination and safeguard soil quality and quantity	0	0	0	No impact
3) To ensure air quality continues to improve	0	□	□	Part of the strategy to reduce the need to travel through mixed town centre use and to provide development where it can be accessed by rail, bus, foot or cycle. The High Street is a highly accessible location for retail, employment and residential.
4) To reduce greenhouse gases	0	0	0	Part of a strategy to ensure mixed use in the town centre and reduce the need to travel.
5) To reduce noise pollution	0	0	0	Retains appropriate uses within town centre.
5) To reduce light pollution	0	0	0	Policy CS6 seeks to ensure light pollution is minimised.
7) To maintain and improve the water quality of the rivers and groundwater	0	0	0	Policy CS6 requires appropriate measures in development to address pollution.
8) To conserve and enhance biodiversity within the plan area	0	0	✓	Policy encourages measures to enhance biodiversity in all development.
9) Provide for employment opportunities	0	✓	✓	Provision of employment uses.
10) Make land available to meet the needs of the economy	0	✓	✓	Provision of employment land.

11) Support economic growth which is inclusive, innovative and sustainable	0	✓	✓	A holistic, planned approach supports sustainable economic growth.
12) Balancing the needs for employment and housing to reduce the need to travel	0	✓	✓	Retail, office, and residential uses to be provided.
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	✓	✓	Housing identified as an appropriate upper floor use.
14) To facilitate the improved health and wellbeing of the whole population	0	0	0	Services, employment and housing complemented by traffic calming and green environment.
15) To reduce poverty and social exclusion	0	0	0	Retail, offices, residential uses in accessible locations.
16) To create and maintain safer and more secure communities	0	✓	✓	Traffic calming and improved provision for pedestrians. Increased natural surveillance through the higher density uses.
17) To improve accessibility to all services and facilities	0	✓	✓	Mixed uses in an accessible location.
18) To make the best use of previously developed land and existing buildings	0	✓	✓	Mixed use and higher density.
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS5 of the Core Strategy requires high quality design that protects/enhances heritage.
20) To reduce road congestion and the need to travel	0	✓	✓	Mixed uses in accessible location.
21) To ensure that the District is prepared for the impacts of climate change	?	?	?	A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD.
22) To increase energy efficiency of new and existing development	0	0	0	Policy CS6 of the Core Strategy requires sustainable design.

23) To increase the production and use of renewable energy	O	O	O	Policy E8 requires renewable energy capacity.
--	---	---	---	---

Summary of issues

The former Woolworths site is a historic building that will be retained in retail use on ground and first floor, with residential of office use above. Other opportunity sites have been identified that would support the strategy to retain and increase appropriate uses within town centre, providing employment, services and housing, including affordable housing, at a location with good accessibility. A more holistic and prescriptive approach to achieving high standards of sustainable design and green infrastructure may be necessary ahead of the production of the Delivery DPD. Consideration could be given to whether greenhouse emissions could most effectively be reduced by funding retrofitting of existing buildings.

From: Coneybeer, Julia (NE) [mailto:Julia.Coneybeer@naturalengland.org.uk]
Sent: 05 February 2010 13:12
To: Karol Jakubczyk
Subject: Re: Epsom & Ewell Plan E Area Action Plan DPD - requirement for HRA?

Dear Karol,

Thanks for contacting Natural England regarding the above. Natural England is satisfied that Epsom & Ewell's Plan E Area Action Plan is not likely to have a likely significant effect on European sites, and as such does not require an Appropriate Assessment under the Conservation (Natural Habitats, &c.) Regulations 1994 (known as the 'Habitats Regulations'). However, for clarity and inclusiveness, we recommend you make this clear in your records to show the Habitats Regulations have been adequately considered during the production of this DPD.

I hope this helps, please call me if you have any queries.

Many thanks,

Julia Coneybeer

Environmental Planning Advisor

Government Team - Surrey, Sussex & Kent

Natural England

Phoenix House,

32-33 North Street,

Lewes,

East Sussex

BN7 2PH

Tel: 0300 060 4062

Email: Julia.Coneybeer@naturalengland.org.uk

Website: www.naturalengland.org.uk



Please consider the environment before printing this email

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender.

Nothing in the email amounts to a legal commitment on our part unless confirmed by a signed communication. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.