

6. Application of Study Findings to Planning Policy

Introduction

- 6.1 This section considers how the findings of the Environmental Character Study could apply to the development of planning policy. It considers the existing and emerging policy context, and reviews the key issues affecting townscape character which have been highlighted by the study. Recommendations on a policy approach are then set out.

Policy Context

- 6.2 The policy context for development within Epsom and Ewell is provided by a hierarchy of national, regional and local policy documents. Key relevant policies are briefly reviewed below.

National Policy Context

- 6.3 PPS1² sets out the Government's overarching principles and objectives for the planning system. One of the objectives is that planning should facilitate and promote sustainable and inclusive patterns of development by protecting and enhancing the quality and character of existing communities (paragraph 5). Key principles include the promotion of high quality design. Design which fails to take the opportunities available for improving the character and quality of an area, or which is inappropriate in its context, should not be accepted (paragraphs 13 (iv), 34 and 35). Planning policies should seek to protect and enhance the quality, character and amenity value of urban areas as a whole, and a high level of protection should be given to the most valued townscapes (paragraph 17). Planning authorities should prepare robust policies on design and access based on stated objectives for the future of an area and an understanding and evaluation of its present defining characteristics. Key objectives should include ensuring that developments respond to their local context and create or reinforce local distinctiveness (paragraph 36). Design policies should avoid unnecessary prescription or detail, and planning authorities should not impose architectural styles of particular tastes. It is, however, proper to seek to promote or reinforce local distinctiveness (paragraph 38).
- 6.4 Another key aim of national policy is to promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings (paragraph 27).
- 6.5 These themes are picked up by PPS3³ which emphasises the aim of creating places, streets and spaces which have their own distinctive identity and maintain and improve local character (paragraph 14 and 16). Local planning authorities should facilitate good design by identifying the distinctive features that define the character of a particular local area. PPS3 reviews the issues related to intensifying existing urban areas. Paragraph 49 states that more intensive development is not always appropriate. However, it is considered that well designed and sited development can enhance the character and quality of an area. Paragraph 50 states that *"the density of existing development should not dictate that of new housing by stifling change or requiring replication of existing style or form. If done well, imaginative design and layout of new development can lead to a more efficient use of land without compromising the quality of the local environment"*.

² Planning Policy Statement 1: Delivering Sustainable Development (ODPM, 2005)

³ Planning Policy Statement 3: Housing (ODPM, 2006)

Regional Planning Context

- 6.6 The South East Plan has been through an Examination in Public, and the Inspectors have issued a report on their findings. Proposed changes are expected to be published by the Secretary of State in summer 2008. Further consultation will then be held on the proposed changes before the final Plan is adopted. The South East Plan will replace the existing regional planning guidance for the South East⁴ as well as the Surrey Structure Plan⁵.
- 6.7 The draft South East Plan reiterates the themes in national planning policy relating to promoting design solutions relevant to context and which build upon local character, distinctiveness and sense of place (Policy BE1). The Plan calls for clear planning and design guidance in relation to the intensification of predominantly residential neighbourhoods. This should be based on local character appraisals and clearly set out the basis on which proposals for the intensification of existing residential areas will be assessed (Policy BE2). Policy BE3 encourages the renewal of suburban areas through a proactive and integrated approach to area management. The draft Plan also encourages the provision of higher densities of development in order to make good use of land and to foster more sustainable lifestyles; it emphasises that higher densities can be achieved with sufficient attention to careful design. Policy H5 states that, in conjunction with the delivery of high quality of design and in order to make good use of land and encourage more sustainable patterns of development and services, higher densities will be encouraged.

Local Policy Context

Core Strategy

- 6.8 Under the Planning and Compulsory Purchase Act 2004 the Council is preparing a Local Development Framework (LDF) for the Borough. The Core Strategy⁶ forms a key part of the LDF and was adopted in July 2007. The Core Strategy identifies the need to protect the high quality of the local environment in an area which faces strong development pressures. The issue of improving lower quality areas is also highlighted (paragraph 2.3.2). Creating a quality environment and special places is one of the Strategy's four broad aims (paragraph 2.6.1). The Strategy sets out a number of objectives including:
- Focussing development on previously developed land within the built up area rather than on greenfield sites and making the most efficient use of sites; and
 - Ensuring all aspects of new development accord with the principles of good design, create safe and inclusive places, and contribute positively towards local distinctiveness (paragraph 2.6.2).
- 6.9 Policy CS1 provides the overarching principles that apply to all new development. The policy states that *"The Council will expect the development and use of land to contribute positively to the social, economic and environmental improvements necessary to achieve sustainable development..."*. Policy CS5 sets out the policy for conserving and enhancing the quality of the built environment. It states that *"High quality and inclusive design will be required for all developments. Development should:*
- *Create attractive, functional and safe public and private environments;*

⁴ Regional Planning Guidance for the South East (DETR, 2001)

⁵ Surrey Structure Plan (Surrey County Council, 2004)

⁶ Core Strategy 2007 (Epsom & Ewell Borough Council, 2007)

- Reinforce local distinctiveness and complement the attractive characteristics of the Borough;
- Make efficient use of land and have regard to the need to develop land in a comprehensive way.”

- 6.10 The Strategy explains that good design is a key part of sustainable development, and that new development should enhance and complement local character, and be capable of integrating well into existing neighbourhoods. The “leafy” appearance of the Borough’s built up areas is highlighted, and the need to maintain and enhance this characteristic is set out (paragraph 3.7.5).
- 6.11 The Strategy also refers to established residential neighbourhoods which have a special character, and states that the Site Allocations DPD will consider whether these areas should be defined (paragraph 3.7.2).

Saved policies from the Local Plan

- 6.12 In September 2007, the Secretary of State issued a Direction listing the policies from the adopted Local Plan⁷ which are saved for development control purposes. The following policies are of particular relevance to the Environmental Character Study:
- Policy BE1 – General policy on the built environment: this requires new development to be of a design which makes a positive contribution to the quality of the built environment;
 - Policy BE19 – Design of new buildings: which seeks to safeguard the character and amenity of the existing built up area. It includes restrictions on building heights (3 storeys in residential areas and 4 storeys in the town centre shopping area and business areas), and sets out criteria for assessing applications including scale, style, materials and colour, design details and the site’s context; and
 - Policy HSG11 – Design and layout of new development: this sets out the criteria against which applications for residential development in residential areas will be assessed. These include density, impact on amenities of existing dwellings, separation distance, garden size, security, design and height, internal space and open and amenity space.

Supplementary Planning Guidance

- 6.13 In 2003 and 2004 the Council adopted Supplementary Planning Guidance (SPG) providing advice on planning applications for extensions to residential properties and infill residential development⁸. Guidance on infill development explains that new dwellings on small plots must be sympathetic to, and complement the character of, the surrounding built form in terms of layout, design and materials. Where development is acceptable in principle, the Council will seek to ensure that it makes a positive contribution to the quality of the built environment

⁷ Epsom & Ewell District-Wide Local Plan (Epsom & Ewell Borough Council, 2000)

⁸ Single Plot and other types of Residential Infill Development, Supplementary Planning Guidance (Epsom & Ewell Borough Council, 2003) and Households Applications: Supplementary Planning Guidance (Epsom & Ewell Borough Council, 2004)

(General Principles G2). The need to balance the aim of making the best use of land against protection of residential amenity and the character of the area is acknowledged (General Principles G5). Both SPGs set out a detailed guidance, prescribing a wide range of limits to development and separation distances, although both explain that the guidelines will be flexibly applied.

Key Issues Identified by the Study

- 6.14 This Study has identified a range of issues which are important in informing the policy approach to protecting the residential built environment. In general terms these are:
- The varied nature of the residential urban area in terms of a range of factors including street layout and urban grid, plot sizes and boundary treatments, building heights, density, massing, building styles and ages, materials, open space and street features; and
 - The varied quality and sensitivity to change of the townscape. The Study has identified a number of areas of high quality and sensitivity to change, as well as areas of lower quality and areas with a mixed character. Policy will need to address the issues related to all these areas, recommending different approaches depending on the existing character.
- 6.15 More specifically, the Study has identified a range of issues which have or could undermine local character as follows:
- Parking pressure - this key issue relates to areas where there is pressure on parking provision, and on and/or off-street parking detracts from the character of the area. Streets or parts of streets are visually dominated by parked vehicles. This issue arises in a range of locations including areas with narrow streets, areas around key community facilities (e.g. hospital, schools), in higher density areas with limited off-street parking and on busy through routes. Many parts of the Borough are affected by this to different degrees including character area 5C, 6, 9, 10A, 11, 12, 12A, 13, 13A, 13B, 14, 16, 16A, 20, 22, 23, 24, 25A, 26, 26B, 27, 27A, 29, 31, 31A, 31C, 32, 33, 35, 36, 39A and 43.
 - Conversion of front gardens to parking areas – following on from the issue identified above, the paving of front gardens currently affects a number of the character areas. Removal of fences, walls and hedges leads to a blurring of the distinction between the public realm and private space. The hard landscaping of lawns and removal of trees and planting changes the appearance and character of the plot (this can also create local flooding issues although these have not been identified by this Study). In streets where a large number of front gardens have been converted to parking, this can have a significant impact on the quality of the area. Character areas which have been affected by this issue to varying extents include areas 7, 13, 14, 18, 22, 27, 24, 27, 27A, 34A, 35A, 35C, 37, 39B, 42 and 43;
 - Infill and backland development – Although there are a number of examples of successful infill development within the existing residential areas, there are also locations where development has had a negative impact on the character of an area. There are locations where individual plots or small groups of plots have been redeveloped, often in the 1960s or 1970s, with schemes which are very different in character to their broader context. These “sore thumb” or incongruous developments may not be sympathetically designed

in terms of building lines and heights, layout, architectural style or materials, and rather than complementing the broader area they detract from the overall quality of the street. Examples of this type of issue can be found in character areas 13B, 19, 19A, 27, 28, 31, 31A, 31C, 32, 35, 35D, 36, 36A, 38, 39, 43 and 50;

- Side extensions – the survey identified areas where side extensions have led to the creation of ‘bulky’ properties with massing greater than is typically found within the area. Examples include character areas 6, 13 and 27A;
 - Vehicular traffic – some of the Borough’s residential areas are dominated by the heavily trafficked routes that pass through them. Examples include character areas 6, 28 and 35;
 - Poor quality green space in the public realm – there are a number of residential areas where soft landscaping provides important green areas within the urban environment. However, some of these areas are in poor condition, are only partially vegetated and lack interest in terms of planting. Examples are found in character areas 6, 9, 14, 20, 23, 42, 43 and 45;
 - Poor quality layouts and deteriorating built environment – A limited number of areas within the Borough suffer from a poorly designed layout which creates issues related to surveillance and security, backs of properties or fencing creating stretches of blank facades and poorly enclosed public spaces. These are also locations where the condition of the built environment is deteriorating. Different areas suffer from these issues to various extents and examples include character areas 9, 10A, 15 and 23; and
 - Inappropriate detailing – the introduction of inappropriate detailing into traditional areas can detract from the area’s townscape character. The introduction of PVC windows into character area 13A is an example of this.
- 6.16 The policy approach set out below seeks to ensure that future development does not exacerbate or add to these issues, and, where possible, makes the most of opportunities to address them.

Recommended Policy Approach

Overall Approach

- 6.17 Drawing on the policy context set out above, the analysis of townscape carried out by this Study and the issues identified, it is recommended that the planning policy approach related to the character of the existing urban residential areas has the following elements:
- It is a comprehensive approach covering the entire urban area;
 - The overall approach should be to promote local distinctiveness throughout the urban area and protect or enhance townscape character. Development should respond positively to the appearance, uses and function of the surrounding area, reflecting or enhancing local character and local distinctiveness;
 - The Council should require a high standard of design in all locations;
 - Areas with higher sensitivity to change (e.g. character areas 21A, 26, 26A, 26B, 34A, 37 and 38) should be protected, conserved and where possible enhanced, including with a view to making better use of urban land. Development should be of a layout, scale, massing and style which complements the existing high quality local environment, appropriate materials should be used and parking should be carefully designed. Schemes should respect, although not necessarily replicate, local character, with designers encouraged to respond positively to the particular features of the area as described in Section 5;
 - In locations which have lower quality and sensitivity to change, the Council should encourage schemes which enhance the townscape of the area (e.g. character areas 9, 15 and 23). Development with different layouts, scale and massing may be appropriate in an area if clear benefits in terms of townscape character can be delivered. Examples include improving surveillance and enclosure of streets and open spaces, providing clear definition of public and private space, improving the design and layout of car parking provision and making better use of land, including poorly maintained amenity space;
 - There are also areas with a mixed character (e.g. character areas 10, 35 and 36A) where the Council should encourage development which reinforces the higher quality elements of the area and contributes towards creating character and local distinctiveness; and
 - The policy approach should be sufficiently flexible to allow designers to respond creatively to development opportunities, avoiding overly prescriptive, detailed or rigid guidance. Site-specific assessment and design which responds to the particular characteristics and opportunities of an individual site should be encouraged.
- 6.18 The overall policy approach will need to be articulated through a number of policy documents. These are discussed below.

Sites Allocations and Development Control DPD

- 6.19 The Council is currently preparing a Sites Allocations and Development Control Development Plan Document (DPD) which will form an important part of the LDF. Consultation on the 'Issues and Options' report was carried out in Spring 2008. It is recommended that this DPD include a borough-wide, criteria-based policy which seeks to protect and enhance townscape character

and quality. This policy would apply to all urban residential areas and would set out the overall policy approach as explained above. This Environmental Character Study would form part of the evidence base underpinning the policy. Box 4.1 provides an example of this type of policy.

Box 4.1: Example Policy

POLICY X - PROTECTION AND ENHANCEMENT OF TOWNSCAPE CHARACTER AND QUALITY

PROPOSALS FOR DEVELOPMENT WITHIN URBAN AREAS SHOULD BE INFORMED BY AND BE SYMPATHETIC TO TOWNSCAPE CHARACTER AND QUALITY, AND SHOULD CONTRIBUTE, AS APPROPRIATE, TO THE INNOVATIVE AND HIGH QUALITY REGENERATION, RESTORATION, ENHANCEMENT, MAINTENANCE OR ACTIVE CONSERVATION OF THE TOWNSCAPE CHARACTER AREAS LIKELY TO BE AFFECTED. PROPOSALS WITH POTENTIAL TOWNSCAPE AND VISUAL IMPLICATIONS WILL BE ASSESSED HAVING REGARD TO THE DEGREE TO WHICH THEY WOULD:

- a) *CAUSE UNACCEPTABLE HARM TO INTRINSIC VISUAL QUALITIES AND CHARACTERISTICS THAT CONTRIBUTE TO TOWNSCAPE VALUE AND SENSE OF PLACE;*
- b) *INTRODUCE, OR REMOVE, INCONGRUOUS TOWNSCAPE ELEMENTS;*
- c) *CAUSE THE DISTURBANCE OR LOSS OF, OR HELP TO MAINTAIN:*
 - (i) *LOCALLY DISTINCTIVE TOWNSCAPE ELEMENTS*
 - (ii) *HISTORIC ELEMENTS THAT CONTRIBUTE SIGNIFICANTLY TO TOWNSCAPE CHARACTER AND QUALITY*
 - (iii) *GREENSPACES AND VEGETATION OF BIODIVERSITY VALUE THAT CONTRIBUTE SIGNIFICANTLY TO TOWNSCAPE CHARACTER AND QUALITY*
 - (iv) *THE VISUAL CONDITION OF TOWNSCAPE ELEMENTS*

Draft policy recommended for inclusion in the Colchester LDF by the Townscape Character Assessment - Colchester, Tiptree, West Mersea & Wivenhoe, Chris Blandford Associates, June 2006 for Colchester Borough Council

overall policy. A criteria-based approach is recommended, which focuses on protecting, conserving and enhancing the special features of the area.

- 6.21 This Study has identified areas with high townscape quality and sensitivity to change as set out in paragraph 6.17. The potential for the designation of these areas as residential areas with special characteristics should be explored, in particular for areas: 21A, 26B, 34A, 37 and 38.
- 6.22 This Study has also highlighted a number of areas with lower sensitivity to change. These are locations where development is less likely to have an adverse impact on character – indeed, these areas may offer potential for development to deliver positive environmental change. The findings of this Environmental Character Study should therefore be used to identify broad areas of search for possible opportunity sites, which could, following detailed investigation, become allocated sites within the DPD.
- 6.23 It may also be useful to include specific policies to tackle particular local issues related to townscape character. For example, some London authorities have reportedly had success in controlling the development of front gardens through the inclusion of specific policies within their adopted development plans (see paragraph 6.27).⁹
- 6.24 Consideration of townscape character would also need to be fed into a range of other policies covering topics including:
 - Residential density and parking;
 - Open space;
 - Biodiversity;
 - Flooding;
 - Heritage; and
 - Regeneration.

Design Guidance

- 6.25 This Environmental Character Study can be used to inform more detailed design guidance which should be developed in the form of supplementary planning guidance. One approach would be to produce a Residential Design Guide as a Supplementary Planning Document (SPD) which comprehensively covers design issues related to residential development in the Borough. This would need to address a wide range of issues which could include sustainable design and construction, use of renewable energy, density, parking, designing out crime and protection of residential amenity.
- 6.26 Drawing on the findings of this Study, an understanding of the features which give different areas their particular local identity and distinctiveness, and the ways in which these should be protected or enhanced, would form an important element of the guidance. Reigate and Banstead Borough Council's Local Distinctiveness Guide¹⁰ provides an example of this type of approach. The Guide describes the key features of the Borough's character areas and includes illustrative case studies explaining how to develop successful residential redevelopment

6.20 Policies to protect areas with particular characteristics, such as Conservation Areas or residential areas with special characteristics (if designated – see below) would sit beneath this

⁹ Crazy Paving: The environmental importance of London's front gardens (Greater London Authority, 2005)
¹⁰ Reigate and Banstead Local Distinctiveness Guide (Reigate and Banstead Borough Council, 2004)

schemes including replacement housing, plot subdivision, infill and development on the edge of the urban area.

- 6.27 The Environmental Character Study could also be used as a framework to inform area-specific design or public realm guidance (e.g. a village design guide) if required, as well as guidance to address specific issues. The latter could include guidance on parking in front gardens. This approach has been taken by a number of London local authorities including the London Borough of Ealing¹¹ and the London Borough of Richmond upon Thames¹². These, and other, authorities have adopted SPDs which explain the types of development for which planning permission is required and set out design principles or criteria, in some cases accompanied by illustrated examples.

Additional Control on Development

- 6.28 While the planning policy approach set out above will provide a mechanism to control a wide range of developments, some types of development do not currently require planning permission. These are currently permitted by the Town and Country Planning (General Permitted Development) Order 1995 and include a range of minor alterations to residential buildings and the paving of front gardens for parking in some circumstances. The Government is currently consulting on amendments to householder permitted development, and it is likely that permitted development rights will change. It currently appears likely that new restrictions on the hard landscaping of front gardens will be included. These may, for example, define the proportion of space that can be paved and the type of materials that can be used without the need for planning permission.
- 6.29 In the absence of planning controls, local authorities can use article 4 directions to remove permitted development rights. The process for article 4 directions is being reviewed as part of the wider review into householder permitted development rights. Issues including: enabling local planning authorities to make directions without the need for the Secretary of State's approval; review of the right to compensation; and a possible requirement for a five year review of article 4 directions are currently being considered.
- 6.30 Depending on the outcome of the current review, article 4 directions provide a mechanism through which the Council could address the issue of paving of front gardens and the loss of plot boundaries to provide car parking in circumstances where planning permission is not currently required. This Environmental Character Study has identified a number of areas where paving of front gardens for parking affects the townscape character of the area (see paragraph 4.13). The use of article 4 directions may be appropriate in some of these locations, and this should be further explored.

Informing Other Studies and Strategies

- 6.31 The Environmental Character Study provides a consistent characterisation of the Borough's townscape character. The findings can be used to inform a wide range of other studies and strategies. These could include:
- Strategies to enhance the public realm including community-based schemes;

- Strategies for open space and green space;
- Biodiversity strategies, including consideration of wildlife corridors;
- Parking management plan which could be particularly important in terms of addressing issues related to the impact of on-street parking on the character of areas; and
- Development of Council-owned land.

Monitoring Change in Townscape

- 6.32 The findings of the Environmental Character Study can also be used to provide baseline data for monitoring change in the Borough's townscapes, and to measure the effectiveness of Council policy in protecting and enhancing townscape character and quality. Indicators of change could be identified based on the key features which define an area's townscape (e.g. plot sizes, boundary treatments, front gardens and landscaping, level of on-street parking, building heights, materials, etc.). To make best use of resources, this could be carried out through the monitoring of change in a sample of key areas.

¹¹ Supplementary Planning Document 8 Crossovers and Parking in Front Gardens (London Borough of Ealing, 2006)

¹² Front Garden and Other Off Street Parking Standards, Supplementary Planning Document (London Borough of Richmond upon Thames, 2006)

Appendix 1: Glossary

Area Action Plan	Development Plan Documents which provide the framework for a specific area which is set to undergo significant change or conservation, for example a town centre.
Character Area	The unique individual geographical locations in which character types occur, displaying a pattern of characteristics which are distinct from any other area, e.g. the 1930's Chase Estate in the west of the Borough.
Character Type	A townscape type which has broadly similar patterns of built form, layout, and landscape elements as other townscapes within the study area: in essence they are generic within the Borough and not restricted to a particular location, e.g. residential estates built (anywhere in the Borough) in the 1930's.
Conservation Area	An area considered worthy of preservation or enhancement because of its special architectural or historic interest, "the character or appearance of which it is desirable to preserve or enhance," as required by the planning authority.
Development Plan Documents (DPD)	The suite of documents which comprise the LDF, outlining the development goals of a planning authority. Once adopted, Development Control decisions must be made in accordance with the DPDs unless material considerations indicate otherwise.
Intervisibility	A judgement of how visible an area is from surrounding areas, and conversely whether an area has extensive views of its surroundings.
Listed building	A building or other structure officially designated as being of special architectural, historical or cultural significance. It is a widely used status, applied to around half a million buildings. A listed building may not be demolished, extended or altered without special permission from the local planning authority
Local Development Framework (LDF)	A relatively recent development in the planning system, consisting of a folder of documents to guide development and land use for an area. LDF's replace Local Plans.
Recreatability	A judgement of how difficult it would be to recreate townscape elements if they were lost. Areas which are considered difficult to recreate include: areas with a very established character (and original materials), or include individually designed properties (rather than mass produced or commonly found types). These areas are considered to have a high recreatability value – which <u>does not</u> mean they are highly recreatable.
Sub Area	The unique individual geographical locations – often small in size - within a particular character area which exhibit distinct differences from the larger character area in which it sits, but which has strong physical links to it, e.g. the tree-lined area at the intersection of Meadway and West Hill Avenue, which falls within the larger character area of the Chase Estate.
Townscape	The urban or suburban version of landscape. It includes the full range of elements one would expect to see or experience in a built setting, from the large scale structure of neighbourhoods, blocks and street layout to the smaller scale individual elements of buildings, gardens, street trees and street furniture.
Townscape Character	A distinct, recognisable and consistent pattern of elements in the townscape that makes one townscape different from another, rather than better or worse. It creates the particular sense of place of different areas of the townscape
Townscape Quality	Assessment of the physical condition and quality of the built form and vegetation of the features within public space and private. In terms of the built elements, the condition and quality of architectural elements on properties, together with plot boundaries and streetscape materials are assessed. For vegetation, the assessment includes coverage, condition and quality of both on-street vegetation and that found in front gardens. An additional judgement on the overall intactness of built and vegetation features is also drawn, assessing to what degree the coherence of the area has been maintained, or whether infill or replacement development has lowered to visual/physical intactness of an area.
Townscape Sensitivity	This judgment combines the assessments from townscape quality and townscape value to attribute a sensitivity to change value. In essence, areas of higher townscape value and/or townscape quality have a higher sensitivity to change. This means that, if development takes place within an area with a higher sensitivity to change, it should be designed with a very high degree of care and detail, so as not to detract from the area's character. All development – regardless of the sensitivity to change of an area – should protect or enhance an area's character.
Townscape Value	Assessment of the relative value attached to different townscapes. Four individual indicators of townscape value were assessed: ecological/biodiversity value; frequency of townscape designations (e.g. tree protection orders, listed buildings), recreatability (see above); and intervisibility (see above). The overall townscape value is an aggregate of the four individual values.

Appendix 2: References

Character Assessment Guidance

The Elements of Style: An Encyclopaedia of Domestic Architectural Detail, Calloway, S. et al., (Firefly, 2007)

Inspections and Reports on Dwellings: Assessing Age, Melville, I., (EG, 2007)

Landscape Character Assessment Guidance for England and Scotland, (Countryside Agency, 2002)

Planning Policy

Core Strategy 2007 (Epsom & Ewell Borough Council, 2007)

Epsom & Ewell District-Wide Local Plan, (Epsom & Ewell Borough Council, 2000)

Planning Policy Statement 3: Housing, (OPDM, 2006)

Regional Planning Guidance for the South East (DETR, 2001)

Surrey Structure Plan (Surrey County Council, 2004)

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Epsom, A Pictorial History, White, T. and Harte J., (Phillimore, 1992)

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