Plan E

Securing a successful future for Epsom Town Centre

Epsom Town Centre
Area Action Plan

April 2011
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CHAPTER 1: Introduction

1.1 As the main town centre in the Borough, Epsom plays a vital role in the community, being the focus for a range of services and activities. The importance of maintaining a vibrant and vital town centre is widely recognised, and government policies positively encourage those involved in town centres to be proactive in their management and change.

1.2 Epsom is a successful town centre although, like all town centres, it faces a variety of challenges and pressures. It has seen significant change over the past few years and this is likely to continue.

1.3 In response to this, the Council, in close association with others in the Local Strategic Partnership (LSP)\(^1\) has produced Plan E, a strategic policy document which provides a detailed vision for the future of Epsom Town Centre. Plan E maps out a way forward for the Town Centre over the next 15 to 20 years, establishing a framework to show how change will take place, how it will be managed and how it will be delivered. It brings together the objectives of many organisations and individuals with an interest in the Town Centre. It also considers the way the Town Centre functions as a whole. It became apparent from the early stages of consultation and evidence gathering in the production of Plan E that Epsom Town Centre does not require significant change or regeneration, rather the focus is on improving and effectively managing what already exists, while making the most of opportunity sites.

An Area Action Plan

1.4 The planning system is a positive mechanism for shaping town centres. Local authorities can produce Area Action Plans which provide a planning framework for areas where significant change or conservation is needed. Plan E is a form of Area Action Plan, and is being produced as part of the Council’s Local Development Framework (LDF).

1.5 The LDF will eventually comprise a suite of planning policy documents which will set out the development plan for the Borough. The Council has an adopted Core Strategy, which provides a strategic vision for the wider LDF, including setting out a vision for Epsom Town Centre. In addition to the Core Strategy and Plan E, the Council is producing another development plan document (DPD) that will set out borough-wide site allocation and development management policies. This document will also contribute towards the delivery of Plan E objectives. Therefore Plan E is not a stand alone document, but should be read in conjunction with the other policy documents.

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\(^1\) The Local Strategic Partnership is a collection of representatives from the local statutory, voluntary, community and private sectors.
The overarching vision for Epsom Town Centre

1.6 The Core Strategy was the first LDF document to be produced and it sets out the long term planning vision for the Borough. Within this document, the importance of the Town Centre is recognised and includes a specific vision for Epsom. The Council committed to producing an Area Action Plan (Plan E) to assist in the delivery of this vision:

- a vibrant, healthy and safe shopping environment combined with a high quality townscape and attractive and accessible environment for all
- thriving day-time and night-time economies
- new developments which are sensitive to the important historic environment will reinforce the distinctiveness of the different character areas and create a "sense of place"
- improved retail attractions increasing the range of types and form of shops and other high street facilities and services
- an improved range and quality of cultural, leisure, social and visitor attractions, including attractive areas in which to sit and to socialise
- an improved public realm that contributes to the Town Centre’s historic character and appearance and provides opportunities for biodiversity enhancements
- improved public transport links and facilities, combined with an enhanced environments for pedestrians and cyclists, providing clear and safe opportunities for movement around the town
- the introduction of measures to reduce the seriously detrimental impact of vehicular traffic
- a mix of housing, including affordable housing to meet local needs, located close to amenities and public transport
- a range of business opportunities providing a wide choice of jobs but broadly maintaining the present balance between employment uses and other town centre activities
- an improved sense of safety and security for all town centre users, at all times of the day and night, and a reduction in anti-social behaviour
- a centre which can be planned, managed and promoted in a positive way.

Overview of Plan E

1.7 Plan E has been through a number of stages in its development to help ensure that what it contains is the most appropriate way forward to deliver this vision. There were various stages of consultation which helped to identify specific issues faced by the Town Centre and ways in which these can be addressed. The document has been informed by ‘evidence base’ work, produced by the Council, its partners, other stakeholders and service providers. It has been subject to a Sustainability Appraisal to ensure that it will help deliver the Council’s sustainability objectives. Supporting documents are available on the Council’s website www.epsom-ewell.gov.uk.

1.8 Plan E establishes the baseline position for Epsom, identifying what currently exists and the issues and challenges faced by the town centre. This is then translated into a series of objectives and area specific visions that will address these issues and deliver the Core Strategy vision for the Town Centre. The
Epsom Town Centre – context

1.9 Epsom Town Centre is the main focus for economic activity within the Borough. It is classified as a secondary regional centre. The Town Centre provides a good range and choice of facilities and caters for a wide range of needs. As well as providing services and functions for those who live, work, study or visit the Borough, it also provides a network of meeting places and social spaces in the public realm.

1.10 The Town Centre is accessible by a variety of transport modes. It has a range of popular public transport links, including numerous bus and railway services providing a variety of direct routes to central London and other surrounding towns and centres. These include bus links to Kingston upon Thames, Croydon and Sutton and railway links to London Victoria and Waterloo, Dorking, Guildford, Wimbledon and Clapham Junction. Accessibility to the Town Centre from other parts of the Borough by public transport is varied. A primary highway route, the A24, passes through the heart of the Town Centre. Part of the A24 operates as a one way system around High Street (west), the Market Place and Ashley Avenue. There have been a number of historic proposals for the A24 to bypass the Town Centre. These are no longer viable or deliverable. Numerous car parks are located within the Town Centre offering a mix of short and long stay provision. In total there are about 2310 car parking spaces located across the Town Centre, of which about 1992 are provided within public car parks.

1.11 In retail terms, Epsom Town Centre competes with a number of neighbouring centres, some of which are ‘higher order’ retail centres with a larger retail offer. These include Kingston upon Thames, Sutton and Guildford. A proportion of Epsom’s potential trade from its local catchment population is lost to these surrounding centres. The retail shopping area within Epsom Town Centre is relatively compact and linear in form. Epsom has a market charter and a twice weekly market is held in the Town Centre.

1.12 Although Epsom Town Centre has enjoyed success as a centre for economic activity there has been limited commercial and retail development in recent years. The commercial stock is mainly comprised of purpose built office blocks (many built before 1970) and older stock located on the upper floors above high street shops. In contrast there have recently been a number of large predominantly residential developments in the Town Centre, which has significantly increased the amount living accommodation within the Town Centre. The new housing developments have made a positive contribution towards the vitality and viability of the Town Centre by increasing the range of uses found within its boundary.

1.13 A large part of the Town Centre is now designated as a Conservation Area. The area has an adopted Conservation Area Appraisal and Management Plan. The area is rich in historic buildings, many of which are listed.

1.14 A significant area of Epsom Town Centre has been identified as a Critical Drainage Area by the Borough-wide Strategic Flood Risk Assessment (SFRA).
The area is considered to be at specific risk from rain water flooding. The SFRA forms part of the LDF evidence base and can be viewed at the Council’s website www.epsom-ewell.gov.uk. The Council is also proposing to produce a Surface Water Management Plan, which will provide further guidance on this source of flood risk. The higher level of flood risk from rain water flooding may have implications for future development proposals. Plan E identifies those opportunity sites that could be affected by this source of flood risk. In other locations, the Council may require future development to incorporate appropriate mitigation measures that meet the requirements of the Surface Water Management Plan and the Environment Agency.

1.15 Epsom Town Centre is built over a Major Aquifer, a natural underground water source which supplies drinking water for human consumption. As a result, the majority of the Town Centre is identified within an Inner Source Protection Zone that serves the East Street Pumping Station. This has implications for the design of new developments and certain types of renewable energy sources, specifically ground source heat pumps\(^2\).

1.16 Recent air quality monitoring within the Town Centre has indicated that national guidelines for nitrogen dioxide are being exceeded at specific locations. At these locations the combination of high volumes of vehicular traffic and townscape topography produces the ‘canyon-effect’, where nitrogen dioxide is contained by surrounding buildings. A detailed assessment is currently being carried out, which may result in an Air Quality Management Area (AQMA) being indentified for part of the Town Centre.

\(^2\) Ground source heat pumps are a form of renewable energy that can be used to heat and cool buildings by converting energy stored in the ground.
CHAPTER 2: Current situation and where we would like to be by 2026

Key issues and objectives

2.1 Consultation and analysis of evidence has led to the identification of some key issues which Plan E needs to address if the Core Strategy vision is to be achieved. From these issues, a number of strategic objectives have been identified. This forms the overarching strategy for Plan E. The objectives and issues are then further refined through the consideration of a number of key areas in the town centre.

2.2 Epsom’s unique characteristics are more fully drawn out through the area specific visions in Chapter 3 and subsequent sections of Plan E.

Land use

2.3 Epsom currently has a good mix of town centre uses, which are important to its long-term vitality and viability.

2.4 The following key issues have been identified:

- Potential for retail decline
- Need to carve out a niche role & improve the quality of retail mix.

2.5 In planning policy terms, Epsom is classified as a Secondary Regional Centre and it should be aiming to maintain this position. It should not be trying to compete with higher order centres such as Sutton and Kingston. Evidence contained within the Epsom Town Centre Retail Study and Health Check (April 2009) suggests that to achieve this Epsom does not require significant retail expansion, but should aim to create a niche / complementary role to other centres. Therefore the focus should be on working with what currently exists, improving the quality of the mix of retailing and the Town Centre environment in order to maintain the existing market share and its position in the regional retail hierarchy. Without improvements there is a danger that Epsom could fall into decline and lose its quality status.

- Pressure on employment land & limited quality employment stock

There is a good commercial office presence in the Town Centre, which helps to strengthen the local economy and provide an important source of employment. However, the strength of the residential market over the past few years and the recent downturn in the economy has been, and continues to be a threat to the commercial office stock. There are generally two types of office within the town centre. Traditional office stock on the upper floors of buildings above shops and purpose built office blocks. Some of the purpose built stock is well maintained, while elements of it are aging and will need improvements to maintain commercial viability. There are few recent commercial developments and the Epsom & Ewell borough-wide Employment Land Review (2006), which forms
part of the LDF evidence base, suggests there is an under provision in employment space across the Borough\(^3\). There is currently limited hotel provision within the Town Centre, although a hotel has recently opened nearby on Epsom Downs and the outline planning permission for the West Park site has provision for another. There appears to be market demand for additional provision.

- **Increasing need for residential development & the need to consider the quality of living**

  Town centres are suitable for higher density housing due to having good transport links and access to a range of facilities. Housing can help increase the level of economic, social and cultural activity and add to safety and security. However, town centres can be noisy places to live and the relationship between residential uses and other uses needs to be considered. Recently there has been significant new housing in Epsom Town Centre and in light of the Borough’s housing targets\(^4\) and the limited amount of suitable housing land, this is likely to continue. Consideration needs to be given to type of residential units provided to ensure this contributes to the housing mix.

- **Need to avoid uses which encourage antisocial behaviour**

  Epsom has a good range of leisure, community and cultural uses across the town centre and no specific gaps in provision have been identified. These uses include the Playhouse theatre, the Rainbow Leisure Centre, a number of commercial gyms, a library, a variety of health care facilities and the Odeon cinema. Evidence suggests that the range of restaurants in the Town Centre is good, while Epsom may be losing some of its bar / nightclub trade to other town centres, although there are concerns that increasing this would lead to an increase in antisocial behaviour.

- **Ensure opportunity sites complement the mix of uses in the Town Centre and meet needs**

  Sites for future development within the Town Centre are relatively limited although a number of opportunity sites have been identified. Consideration needs to be given to the location of such sites and the role they can play in helping to reinforce the Town Centre’s vitality and viability.

- **Opportunities for low carbon energy generation**

  Achieving a reduction in CO2 emissions is a national target, reflected in the Surrey Climate Change Strategy, the Surrey Local Area Agreement and the Council’s Climate Change Action Plan. Town centres have a high intensity of uses and have the potential to deliver decentralised renewable and low carbon energy\(^5\). Such schemes should be encouraged on key opportunity sites with the ambition of delivering a town centre low carbon energy network. The higher intensity of land uses found within the Town Centre suggests a higher level of

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\(^3\) Core Strategy Policy CS11 reflects this evidence by resisting the loss of employment land in Epsom Town Centre.

\(^4\) The borough-wide housing target is set out in the Core Strategy under Policy CS7.

\(^5\) Forms of renewable and low carbon energy currently can include energy from wind, photovoltaics (light), biomass (organic fuels – including organic waste) and landfill gas. Not all of these will be appropriate for Epsom.
viability and deliverability. Localised low carbon energy generation has a significant role in mitigating the adverse impacts of climate change.

**Objectives:**

1. Ensure that the Town Centre contains a well balanced mix of uses that meets the needs of the catchment population
2. Ensure Epsom anchors its retail position, through improving the quality of retail mix
3. Retain and enhance where possible a range of leisure, cultural and community facilities
4. Ensure that Epsom remains a focus for employment uses and maintains and enhances the attractiveness of its location to existing and potential businesses
5. Ensure high quality, higher density residential accommodation, which meets local needs is appropriately located within the Town Centre
6. Seek opportunities to generate decentralised renewable and low carbon energy

**Movement & accessibility**

2.6 It is important that Epsom Town Centre is accessible by a variety of means of transport, while good pedestrian environments are vital to achieve a healthy and successful town centre.

2.7 The following key issues have been identified:

- **Traffic congestion & the negative impact of motorised traffic – impact on environmental quality and barrier to pedestrian movement**

  The A24 runs through the heart of the Town Centre. This currently operates as a one way system and traffic which uses this route has a big impact on the Town Centre. There is often congestion during peak periods, while at other times the traffic can be free flowing. Congestion is caused by a number of factors including the volume of traffic, illegal parking on the highway and delivery vehicles. This is supported by the current PARAMICS micro-simulation traffic model and a recent study of illegal parking along the A24 within the Town Centre. The motorised traffic has a detrimental impact on the town centre environment, creating barriers to pedestrian movement and reducing air quality.

- **Need to maintain and improve pedestrian routes**

  Epsom Town Centre is generally well provided for in terms of pedestrian routes and linkages. However, the A24 creates a number of barriers to movement, particularly at junctions. This is supported by the footfall data considered by the Epsom Town Centre Retail Study (April 2009). The signing and maintenance of a number of routes could also be improved (for example the numerous alleyways). The specific needs of all pedestrians must be considered. **Difficulty for cyclists (both in terms of movement & parking)**
The Town Centre is difficult for cyclists to negotiate, with the one way system imposing lengthy routes across the town. In response to this, footways are often used by cyclists to the detriment of pedestrians. Some routes are regarded as unpleasant and sometimes threatening for cyclists. The availability of cycle parking is limited.

- Need for improved management of parking

Parking in the Town Centre is an issue which requires attention. It is important that the approach to parking provision is clearly informed in order to balance competing aims and demands (town centre vitality and viability, accessibility, impact on areas adjacent to the Town Centre, sustainability and revenue). The current approach is not comprehensive.

### Objectives:

1. Improve the balance between vehicular movement and pedestrian movement reducing the dominant and detrimental effect of traffic on the Town Centre
2. Reduce the number of vehicles that pass through Epsom Town Centre and improve flow
3. Make alternatives to the private motor car such as cycling and public transport more attractive (e.g. through improving accessibility and convenience)
4. Improve and create safe pedestrian routes and links around the town centre which are inclusive to all
5. Improve the management of Town Centre parking with emphasis upon controlled parking initiatives

### Public realm & public spaces

2.8 The spaces around and between buildings including streets, squares and green space have a major part to play in the character and attractiveness of a town. As well as being able to move around easily, it is important that people of all ages and abilities feel the town centre is a safe and welcoming place. A high quality public realm can help generate civic pride, stimulate economic investment, and enhance the town’s image and visual quality while also helping to deter anti-social behaviour. The Epsom Town Centre Retail Study and Health Check (April 2009) reinforced the important contribution made by the public realm towards continued economic vitality and viability.

2.9 The following key issues have been identified:

- **The quality of the public realm - street clutter and an uncoordinated appearance**

  Although Epsom is considered to have a satisfactory public realm, there is room for improvement, especially when considering the role and image that it wishes to project as a high quality market town. Street clutter is an issue, which leads to an untidy appearance as well as being a hazard for the visually impaired.
Greenery and trees are considered positive features where enhancements should be sought. Maintenance of the public realm is also important to ensure high standards remain. There are a number of different organisations responsible for the current regime and there could be more effective co-ordination of their roles in relation to maintenance of the Town Centre.

- **Under-utilisation of existing public spaces**

There are specific public spaces in the Town Centre, which are focal points for activity, such as the Market Place and Derby Square. These spaces are a haven for pedestrians often sheltered from the impact of traffic and do not currently maximise their full potential. Active frontages on buildings facing the public realm can add interest.

- **The appearance of some buildings**

The public realm is enhanced by numerous attractive buildings; a significant part of the Town Centre is designated as a Conservation Area, which contains a high number of nationally and locally listed buildings. However, several buildings are in poor condition, which has a negative impact on the appearance of the wider Town Centre.

**Objectives:**

12 Create a high quality, attractive, safe and uncluttered street scene  
13 Improve the quality, use and management of existing public spaces and seek the creation of new ones  
14 Improve the overall management of the public realm to maintain high standards  
15 Introduce greenery and other biodiversity enhancements wherever practicable  
16 Encourage the repair and maintenance of privately owned buildings

**Identity, character & management**

2.10 Successful places all have a strong identity or brand. Building on and strengthening Epsom’s distinctiveness and character is important for the long term success of the town, helping to create a place that is attractive to everyone.

2.11 The following key issues have been identified:

- **Strong historical associations are not adequately reflected in the town centre**

Epsom is a town of international repute. It was once a spa town, famous for Epsom salts. It has had a long association with the horse racing industry, being the home of the renowned Epsom Derby. It is also a centre for creativity, with both the University for the Creative Arts and the acclaimed Laine Theatre Arts College being within Epsom. Currently the town centre is not making enough of these associations.
• The importance of the market to the identity and vitality of Epsom

Epsom is a market town, being granted its charter in the 14th century. The market continues today and is a distinctive part of the town centre’s character.

• Perception that new development can threaten character

Within the Town Centre, buildings vary in terms of height, scale, style and materials. A number of recent developments have been identified by some as out of keeping with the prevailing character of the Town Centre.

• Ensuring Epsom remains a safe, family orientated destination

Epsom is perceived as being a family orientated town. This is a desirable image that many consider should be reinforced and promoted. An essential element of addressing this issue will be to ensure that there is a vibrant and diverse range of uses that encourage shoppers to spend longer periods of time in the Town Centre (this is known as dwell-time). Current dwell-times are in the two-three hour range. Many traders and businesses desire a five hour shopper dwell-time. It is noted that there have been problems with antisocial behaviour, particularly in relation to the evening/night time economy. The Council and its partners continue to take action to address this issue.

• Need for town centre management

Currently no one organisation is responsible for overseeing the functioning of the town centre, the responsibility is divided mainly between the public and private sector. Ensuring the actions of such organisations are coordinated can bring many benefits to the Town Centre.

Objectives:

17 Strengthen the role and quality of the market as a central feature of the Town Centre
18 Build upon Epsom’s identity, using its historic and current associations
19 Enhance the existing character and thereby improve the ‘sense of place’
20 Promote the town as a high quality, safe destination
21 Establish a form of town centre management
CHAPTER 3: The future Town Centre

Town Centre visions

3.1 The following section outlines the visions for the key areas of the Town Centre. This section provides a greater geographic focus for the overarching issues and objectives set out within the previous section. The distinctive qualities and problems faced by the Town Centre are set out. The Town Centre vision areas are shown on Map 1.
Map 1: Town Centre Vision Areas
The Old Town & Market Place

The Vision

The Old Town and Market Place will remain the functional heart of the Town Centre. This will be a safe, vibrant, thriving and attractive environment where people will want to spend time shopping and relaxing. Continuous improvements to its appearance and to accessibility will make this an area where high street shops and businesses flourish and the area’s historic character remains a key part of the wider Town Centre brand image. The Market Place will be the focus for an exciting mix of street-based activities, which could include quality pavement cafes, street entertainment and a permanent market. South Street and West Street will be home to high quality independent shops and restaurants. The impact of the adjoining road network will be minimised; pedestrians & cyclists will have greater priority, public transport will be a viable alternative and through traffic will be substantially reduced.

The Current Position

3.2 This area is the town centre’s historic core, with a street layout and development pattern dating from the 17th and 18th Century. It is protected as a Conservation Area. It is part of the Town Centre shopping area with the majority of the buildings along High Street (west) in use as shops, pubs or restaurants. West Street has a mix of smaller retail units, offices and residential uses. South Street is also includes a number of independent retailers, and restaurants, pubs and leisure uses, which contribute to the town centres night time economy. The Market Place is a key part of the town’s identity, providing a location for cultural events, street markets and public open space within the heart of Epsom.

3.3 Key elements of this area are:

  **Townscape:**

  - Many of the buildings in this area are nationally or locally listed. These buildings reflect a variety of different architectural styles, finished in materials and details which make a valuable contribution to the character of this part of the town
  - The southern parts of High Street (west) include a number of significant modern buildings, including parts of the Ashley Centre, that have been successfully integrated into the surrounding townscape. In contrast, some of the modern developments on the northern side of High Street (west) have been identified as lacking architectural interest and having a dominating impact upon the character and appearance their historic neighbours.
  - The historic Market Place Clock Tower is a positive and distinctive local landmark

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6 The Town Centre Conservation Area has recently been subject to a conservation area appraisal and management plan. This forms part of the Plan E evidence base.
7 Set out within the Town Centre Conservation Area Appraisal and Management Plan.
• The southern part of the High Street (west) is generally characterised by lower rise buildings, with the occasional taller building such as the historic Assembly Rooms. The buildings along the northern side of the High Street (west) are more varied in their height, ranging from two-three storeys through to high four storey buildings. These help create an interesting and varied roofscape.

**Public open space:**

• The exceptionally wide High Street (west) is part pedestrianised along the Market Place and part open to traffic, along its northern side. This provides long views into and out of the High Street (west)
• The pedestrianised Market Place provides a home to street traders, weekly street markets, regular farmers markets and cultural events. On sunny days, it is also serves as a nice place for visitors to the town centre to sit, eat and drink
• The open pedestrian areas at West Street and South Street junction serve as transition to the narrower edge of town streets. This is a reflection of the historic street layout
• The area contains a number of trees and a range of planting features that contribute to its character and appearance. This includes a number of significant and historic trees such as the yew tree opposite Café Rouge.

**Access:**

• The area is separated by a one-way traffic system, which divides the northern side of the High Street (west) from the Market Place to the south. Traffic volumes and congestion serve as an additional barrier to pedestrian movement that has a negative impact on the shopping environment
• The highway junctions between High Street (west), the Spread Eagle and West Street serve as major barriers to pedestrian movement to other parts of the Town Centre. Improvements that allow pedestrians to move freely and safely across these junctions will make a positive contribution to the shopping environment
• The pedestrianised part of the area along the southern side of High Street (west) and Market Place has high pedestrian footfall. Levels of footfall are lower on the northern side of the High Street (west) and they decline rapidly on westward routes out of area towards West Street and South Street

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8 Epsom Town Centre Survey of Building Heights (2009).
A number of existing pedestrian routes provide direct links between the High Street (west) and Epsom Railway Station to the north. Improvements in signage, lighting and public realm could help to make these footways more attractive routes for pedestrians.
Challenges and opportunities to be addressed by Plan E

3.4 In order to deliver our long term vision for this part of the Town Centre, Plan E will focus upon the following broad actions. The issues that influence the vision for this part of the Town Centre are expressed on Map 2.

3.5 This historic part of the Town Centre has a distinctive character that is markedly different from neighbouring areas. The Market Place's wide open space, the mixture of smaller scale and historic buildings, all contribute to its distinctive character and appearance. The Town Centre Conservation Area Appraisal identifies a number of buildings within this area that were judged to have a neutral or negative impact on the character and appearance of the conservation area. Actions for Plan E include:

- Maintaining and enhancing the character and appearance of this part of the Conservation Area by ensuring good design as part of the development management process
- Maintaining shop and commercial frontages throughout this area to reinforce the role of this area of town as a key part of the primary shopping area
- Providing the flexibility for residential and business uses on upper floors to aid continued town centre vitality and viability.

3.6 Traffic flowing past the market place is often congested and creates a barrier to pedestrian movement. Noise and traffic fumes have a detrimental impact on the environment.

- Consider options that reduce the volume of traffic travelling through the High Street (west) and Market Place
- Introduce a range of improvements that will make the area more attractive for pedestrian and cycle movements. Specifically, introduce physical improvements to the footpath network that allow easier and safer pedestrian movements between the High Street (west) and the junctions at the Spread Eagle and West Street.

3.7 The Market Place is an asset to the Town Centre, although its potential is not currently being maximized. The use of this area could be increased along with improvements to the public realm.

3.8 Retaining the quality and diversity of the retail offer will be important to reinforcing the role of this area and the identity of Epsom. The retail units along South Street and West Street offer more specialist and niche retailing opportunities although suffer from the influx of competing uses such as fast food takeaways.

3.9 The public realm is uninspiring and improvements could be delivered to help achieve a more high quality environment. By rationalising street furniture and providing more appropriate seating, for example in the Market Place, the area will become more visually attractive and less cluttered.
The High Street (east)

The Vision

Over the next twenty years the eastern part of High Street (east) will be reborn as a traditional-style high street shopping environment, reflecting its history as a historic 1930s shopping parade. It will become a pleasant and busy retail environment that provides a strong pedestrian link between the retail heart of the Town Centre and the specialist and niche shopping available along Upper High Street. The mix of retail uses will provide shoppers with an experience that draws them from one end of the Town Centre to the other. Derby Square will be a bustling piazza that will provide opportunities for people to meet, eat and drink safely throughout the day and into the evening. The Town Hall car park will be enhanced in appearance and will be a more flexible public space away from the town centre traffic. Pedestrians will be able to move freely and safely. There will be a reduction in the impact of traffic. Illegal parking will be strictly enforced against and provision will be made for rear servicing.

The Current Position

3.10 This part of the town centre dates from the 1930s and has recently been included in the Epsom Town Centre Conservation Area. It runs between the Spread Eagle and the Quadrant junctions and forms part of the primary shopping area. Before the development of the Ashley Centre, this was the town’s historic retail core and since then it has experienced some decline.

3.11 Key elements of this area are:

**Townscape:**

- The northern side of High Street (east) contains a notable 1930s neo-Georgian terrace. The homogenous appearance of this parade makes a valuable contribution to the character of this area.
- The southern side of High Street (east) contains more varied buildings being mainly late 19th Century with some 20th Century infilling.
- Whilst 3 storey buildings are common in the area, there is variety in roof forms, particularly on the southern side of High Street (east).
- The Ebbisham Centre, set back from the main High Street (east) and fronting a public square (Derby Square) is a recent development and of greater height (4 storeys) than the surrounding buildings.

**Public open space:**

- Derby Square and Oaks Square are areas of pedestrianised public space set back from the High Street (east) and shielded from the impact of motorised traffic. These were created as part of the Ebbisham development. A statue forms a focal point in Derby Square, although there is the potential to increase the usage of this area through making it more attractive for pedestrians.
- The Town Hall car park can be accessed by pedestrians through an alleyway from the High Street (east). This area also has the potential to be
a more useable public space, again providing an area that is sheltered from the impacts of the A24.

- Greenery in High Street (east) is limited, although colour is provided by the floral planting displays along the central reservation. A number of trees were planted as part of the Ebbisham / Derby Square development.

**Access:**

- The A24 runs through the centre of this area, with a railed central reservation and crossing points for pedestrians at each end and in the centre.
- Barriers to pedestrian movement are created by the central reservation running down the centre of High Street (east). Additionally, the junction known as ‘the Quadrant’ is a considerable obstacle with guard railing and numerous crossing points creating a confusing and convoluted route for pedestrians wishing to reach the eastern parts of town.
- Away from the A24 there are a number of good pedestrian links around this area.
  - Derby and Oaks Square, provide a useful pedestrian link from the High Street (east) to the Station.
  - A shared cycle / footway runs adjacent to the railway line to provide a cut through from East Street to the railway station.
  - The Town Hall and Town Hall car park can be accessed from the High St via a footpath.
- Traffic flow is often interrupted by illegal parking, delivery vehicles and buses along this stretch of the High Street (east), leading to congestion and a detrimental impact on the town centre environment.
Challenges and opportunities to be addressed by Plan E

3.12 In order to deliver our long term vision for this part of the Town Centre, Plan E will focus upon the following broad actions. The issues that influence the vision for this part of the Town Centre are expressed on Map 3.
3.13 This part of the Town Centre forms part of the main retail area of the Town Centre and acts as an important link between the western and eastern parts of the Town. This area has a very distinct character and it is important that the cohesiveness of this stretch of the High Street (east) is retained.

- Maintain a continuous frontage of shop and commercial uses in this area to help reinforce its role as part of the primary shopping area
- Maintain a mix of commercial and residential uses on upper floors to add to town centre vitality and viability.

3.14 Ease of pedestrian movement through and across this area is important to help the cohesiveness of the whole town centre. Improving links with adjacent areas such as Upper High Street will be particularly important.

- Deliver improvements for pedestrians at the Quadrant junction and consider the removal of physical barriers such as the pedestrian guard railings / central reservations
- Improve access to Derby Square, potentially through the former Woolworths store, the rear of which fronts on to Derby Square
- Investigate the opportunity for a potential additional access to the Town Hall car park through the creation of a footpath between 13 and 15 High Street (east) as part of the creation of the Town Hall Square.

3.15 A number of public spaces which are sheltered from the impacts of the A24 are found within this area (for example Derby Square). Increasing the use of such areas can help add the vitality of the town.

- Delivering an increase in the number of active frontages in Derby Square. Currently the rear of the former Woolworths and the entrance from High Street (east) present blank, uninteresting facades
- Improvements to treescape and biodiversity where possible
- Increasing the amount of seating in Derby Square to increase the usability of this area by pedestrians.

3.16 The A24 is often congested along the High Street (east) due to obstacles in the highway such as illegally parked vehicles, waiting buses and delivery vehicles.

- Improve enforcement against illegal parking
- Work in partnership with public transport operators to identify appropriate locations for bus lay-over provision
- Encourage the use of rear servicing where it exists and create opportunities for provision where it currently does not exist.
**Upper High Street / Upper Town**

**The Vision**

Upper High Street will become a vibrant, successful and attractive part of the Town Centre that people will want to visit for leisure and shopping activities. The area’s historic built environment will be protected and enhanced, as an important part of its distinctive image. It will be home to high quality and niche retailers, family-friendly restaurants and other leisure activities, including the cinema. New development at the eastern end of Upper High Street will attract shoppers to the entire range of retail and leisure opportunities available there. Development will also create opportunities for the generation of low carbon/renewable energy, to be distributed to businesses and residents across the Town Centre. Pedestrians and cyclists will be able to move freely and safely through this area and there will be strong links between Upper High Street, the adjoining public car parks and the rest of the Town Centre.

**The Current Position**

3.17 The Upper High Street/ Upper Town area dates from the Victorian period and is now largely included within the Town Centre Conservation Area. The area forms the eastern extent of the Town Centre’s shopping area, with most of Upper High Street’s retail units identified as secondary retail frontages. Upper High Street provides more independent and specialist shops than the busier areas of the Town. The area includes a major cinema and a number of restaurants, which are significant attractions, especially for the Town Centre’s night-time economy. This area also contains the Council owned Upper High Street and Depot Road public car parks, which provide long-stay parking provision for the whole of the Town Centre.

3.18 Key elements of this area are:

**Townscape:**

- The far eastern end of Upper High Street forms a gateway into the Town Centre from the south east. The transition from the domestic scale residential developments focused around the adjoining Pikes Hill Conservation Area into the Town Centre will need careful consideration in design and townscape terms. The northern part of Upper High Street is almost entirely comprised of a Victorian shopping parade, which is of a basically uniform character and appearance. The southern side of Upper High Street partially reflects the northern side but is fragmented by modern mixed use developments, including offices, a cinema and residential uses. These modern developments are of a bulkier scale, massing and design
- The far eastern end of Upper High Street includes the historic former Town Railway Station, which is partially concealed behind a row of single storey retail units

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9 Set out within the Town Centre Conservation Area Appraisal and recent CABE design review for a major development proposal along Upper High Street.
• The large public car parking provision located to the south and east of the vision area serves as a break between the intensive commercial character and appearance of the Town Centre and the adjacent domestic scale residential uses.

Public open space:

• The area contains wide pedestrian pathways but the overall public realm is poor. Maintenance of footpaths is not integrated and surface materials are mismatched
• There is limited biodiversity.

Access:

• The links between this area and the rest of the Town centre are poor. This is reflected by it having the lowest pedestrian footfall. There is a direct link between low pedestrian footfall and shopping vitality and viability, and the range and type of use attracted to this part of the Town Centre
• The area is separated from the High Street, and the rest of the Town Centre, by the Quadrant junction. Pedestrian routes across this junction are complex and unattractive, and consequently this junction is a major barrier between the Upper Town and the rest of the Town Centre
• Upper High Street provides a direct cycle route into the Town Centre from the south east but as with other gateways into Epsom existing cycle routes end as they enter the Town Centre
• Need to retain an appropriate level of public long-stay parking provision in adjacent car parks. The management and charging regime for this provision will seek to optimise their usage
• Pedestrian links between the car parks and Upper Town need to be improved in terms of safety, lighting, signage and overall public realm.
Challenges and opportunities to be addressed by Plan E

3.19 Within this part of the Town Centre Plan E will focus upon the following key issues. The issues that influence the vision for this part of the Town Centre are expressed on Map 4.
3.20 Plan E will protect and enhance the vibrant mix of specialist and niche retail uses, restaurant, leisure and business uses through the identification of secondary retail frontages. This will discourage further penetration of fastfood uses within this part of the Town Centre.

3.21 Site allocations at the far eastern end of Upper High Street will deliver new uses that positively contribute towards economic activity along Upper High Street and the wider Town Centre. The design of these future new buildings will help define the gateway to the Town Centre.

3.22 The impact of the redevelopment and regeneration of the Depot Road and Upper High Street allocation site will enhance the character and appearance of both adjoining Conservation Areas. The redevelopment of the area around Pickard House provides an opportunity to enhance the character and appearance of this part of the Town Centre Conservation Area. This would also provide an opportunity to improve the setting of the adjoining locally listed former Town Railway Station.

3.23 Plan E’s management options will introduce public realm improvements. These will specifically seek to improve the appearance of pedestrian paving, street furniture and biodiversity.

3.24 Access improvements will seek to strengthen the links between Upper High Street and the wider Town Centre. In particular, pedestrian and cycle movements across the Quadrant junction will be made easier in order to encourage linked trips between the main shopping areas located along the Market Place and the High Street (east), and the specialist shops, restaurants and leisure uses found in Upper High Street.
The Rest of the Town Centre

3.25 In addition to the key areas identified above, Plan E sets out a series of shorter visions for the following areas. The issues that influence the visions for these areas are expressed on Maps 5 to 7:

Ashley Centre and Ashley Avenue

The Vision

The Ashley Centre will remain an integral part of the Epsom shopping experience. It will continue to be home to a mix of quality national retailers and will have improved pedestrian links to adjoining areas of the Town Centre.

Ashley Avenue will continue to be the location for one of Epsom’s key employment areas, providing a high quality environment that will be attractive to major employers.

The Current Position

3.26 The Ashley Centre is a high quality in-door shopping mall that has served Epsom’s residents since the mid-1980s. It continues to be home to a number of established national retail chains. It has pedestrian access routes and shopping frontages onto the adjoining Market Place. There is potential to expand the extent of these shopping frontages onto parts of Ashley Road and Ashley Avenue. The Ashley Centre incorporates a significant public car park, which serves the wider Town Centre. The car park currently operates effectively and there is sufficient provision comprised of over 700 parking spaces. There are opportunities through improvements to the management and charging regimes to further optimise its use.

3.27 Ashley Avenue is one of the Borough’s significant employment areas, which is home to a number of local and high profile employers, including WS Atkins. Existing office stock is generally of a good quality and is set within pleasant surroundings. The scale, height and intensity of developments within this area are significantly greater than other parts of the Town Centre.

3.28 The A24 runs through this area as part of the busy one-way system that circulates traffic around the Old Town and Market Place. The pedestrian and cycle links across the A24, particularly between the wider Town Centre and the adjoining Parks and University would benefit from improvements to these networks.
Challenges and opportunities to be addressed by Plan E

3.29 The vision for this part of the Town Centre is expressed on Map 5 Plan E needs to ensure that the Ashley Centre forms part of the Epsom shopping experience and not just an end destination by itself. In order to deliver this objective, the
retail offer across the wider Town Centre will need to improve to help draw shoppers across its entire length. Improvements to the pedestrian environment and public realm will aid this process. The Ashley Centre will need to evolve with these external improvements; improvements to pedestrian access and potentially developing new shopping frontages that will attract people through the centre. The partnerships between the Council, the Centre operators and the emerging Town Centre management regime will be critical in ensuring seamless delivery. Implementation of the Parking Strategy will ensure that visitors to the Town Centre have access to a range of parking opportunities, which will help the Ashley Centre optimise the use of the public car park.

3.30 Plan E will protect and enhance the area’s employment offer through the application of its Town Centre boundary policies. The Council will continue to work closely with the area’s existing and future employers to ensure their retention within Epsom. The emerging town centre management regime will also have a role in attracting new employers to Epsom.

3.31 Opportunities to intensify employment activity within this area will be considered. The Council believe that this is an area that has some capacity to accommodate buildings of 16 metres in maximum height. The development management process will ensure that such future proposals have a positive impact upon the wider townscape.

3.32 Plan E’s highway improvement options will remove a significant proportion of unnecessary through-traffic from Ashley Avenue, during the early part of the plan period. This could aid the early delivery of improvements to pedestrian and cycle routes across the area.

**East Street**

**The Vision**

Over the next twenty years East Street will establish itself as the main business district for both Epsom and the wider Borough. It will become a desirable office location for employers and their employees. Improvements to the transport network will make it a safe and pleasant environment that is easily accessible to the rest of the Town Centre by foot and cycle. At street level, a mixture of small shops and other commercial uses will draw pedestrians along its length. The comprehensive redevelopment of the utility land to the north of East Street will provide a mix of further high quality office accommodation, new housing and open space.

**The Current Position**

3.33 East Street follows the route of the northbound A24 out of the Town Centre. It is already an important business area that houses a number of major employers within the large office buildings that line both sides of this broad street that runs between the Quadrant junction and Kiln Lane.

3.34 Much of the existing office stock is modern and of a good quality. However, there are a number of vacant or part-vacant sites that have a negative impact
upon the area. Optimising the future employment use of these sites is an important objective.

3.35 The scale, height and intensity of developments within this area are significantly greater than other parts of the Town Centre. These are key components of the area’s character and appearance.

3.36 The area also includes a large open site currently occupied by a number of utility infrastructure providers. Certain types of utility infrastructure uses are designated as notifiable installations by the Health and Safety Executive. These uses are subject to planning controls aimed at keeping them separated from housing and other incompatible land uses. Until these uses are relocated, the Council will consult the Health and Safety Executive on incompatible development proposal on land adjoining the notifiable installation.

3.37 The north eastern part of the site adjoins Stones Road Pond, which is a Site of Special Scientific Interest (SSSI) and home to a great crested newt colony. This is an underused site with the potential to deliver significant benefits for the area through mixed use development comprised of commercial, open space and residential uses.

3.38 Although located on the northern edge of the Town Centre, the area is well served by public transport, pedestrian and cycle routes. It is within walking distance of Epsom Railway Station. However, the area is dominated by traffic travelling along the A24. During peak travel-periods the traffic emissions and noise can be intrusive. Long-stay public parking provision is available at the Hook Road car park.
Challenges and opportunities to be addressed by Plan E

3.39 The vision for this part of the Town Centre is expressed on Map 6. Our research shows that the Borough does not have sufficient available employment floorspace to meet future needs. Consequently, for Epsom to remain a sustainable place to live and work the use of existing employment
sites will need to be optimised. It is appropriate that the highly accessible East Street area serves as a focus for future high density employment. Existing office buildings and the adjoining utilities site provide opportunities for further intensification, either through refurbishment or new development. Improvements to pedestrian accessibility and the associated public realm will enhance the attractiveness of the area for employers and employees. Maintaining a mix of appropriate uses will ensure that the area remains vibrant outside of the working week. This will include the incorporation of new residential uses and the retention of ground floor retail uses.

3.40 This area’s characteristic townscape provides an opportunity to accommodate new development of a scale, massing, bulk and height that would be inappropriate in other parts of the Town Centre. This is particularly the case within the utilities site, which has the capacity for higher density employment uses. However, future developments across this area will need to respect the sensitivities of the adjoining Adelphi Road and Linton’s Lane Conservation Areas, the Stones Road Pond SSSI and the predominantly residential area to the south of East Street.

3.41 The comprehensive redevelopment of the adjacent Utilities Site provides an opportunity to introduce pedestrian and cycleway improvements to this part of the Town Centre. In particular, there will an opportunity to introduce a dedicated cycleway along East Street and provide for improved pedestrian links across the Hook Road junctions.
Epsom Railway Station and Station Approach

The Vision

Epsom Station will be redeveloped to provide a mix of uses including a greatly improved station concourse and new housing. This area will be enhanced as the principal public transport gateway into the Town Centre. The Station will continue to be a busy and vibrant sustainable transport hub and will provide a welcoming environment for residents, shoppers, workers and other visitors to the Town. There will be a number of safe and attractive pedestrian routes radiating out from the area that will draw visitors through into the bustling High Street and Market Place. Neighbouring high quality housing will provide sustainable places to live within the heart of the Town Centre.

The Current Position

3.42 Epsom Railway Station is the third busiest in Surrey, providing a valued public transport interchange for residents, shoppers, commuters and other visitors to the Town Centre. However, the station building and associated facilities are no longer fit for purpose. The poor condition of the station building reflects badly upon the image of the Town Centre, which may discourage both shoppers and retailers from coming to Epsom.

3.43 Whilst Epsom Station is within easy walking distance of the Town Centre’s shops, community facilities and employment opportunities, the existing pedestrian links between the Station and the Town Centre are confused. The Council has succeeded in delivering improvements to the principle pedestrian through-route to the Market Place. Further improvements to the other through-route, adjoining the TK Maxx site, could be achieved through redevelopment. The Station is a popular destination for cyclists, with existing cycle parking provision both within and surrounding the Station being oversubscribed.

3.44 A number of bus services do stop at the Station concourse. However, many of the shoppers who visit Epsom prefer the convenience of the bus stops located within the Old Town and Market Place.

3.45 The southern side of Station Approach is characterised by tall buildings that are mainly in residential use.

3.46 Whilst Station Approach has benefited from the new tree planting incorporated in the recently implemented highway landscape scheme, the overall biodiversity of this part of the Town is limited. However, the adjoining railway embankments provide a rich unmanaged habitat that serves as a biodiversity link across the Borough.
Challenges and opportunities to be addressed by Plan E

3.47 The biggest challenge within this vision area will be the delivery of a new Station that meets the planned for needs of residents, commuters, shoppers, businesses and other visitors to the Town Centre during the Plan E period.
This part of the Town Centre also provides an appropriate location for new higher density residential uses. Comprehensive redevelopment of this site provides an opportunity to improve the wider townscape through the delivery of a well designed, high quality development that is sympathetic to the historic character and appearance of the area.
CHAPTER 4: How will we get there?

How Plan E will deliver this vision

4.1 The earlier chapters have identified the current position in Epsom Town Centre and shown how it will change and develop up to 2026. To help guide this, a number of overarching objectives have been identified, which have been made more spatial through the development of visions for each of the key town centre areas. The remaining chapters in Plan E set out the approach and policies which will help deliver these objectives and visions.

4.2 Consultation and evidence has shown that Epsom does not require significant change or regeneration, but the focus is to be on improving and managing more effectively what currently exists, while making the most of the development opportunity sites.

4.3 The approach to deliver the objectives and visions will be through a variety of mechanisms, and the approach is briefly set out below;

- **Policies for guiding land uses within a defined town centre boundary**

  It is important that an appropriate mix of uses, such as retail, employment floorspace, leisure facilities and new housing, is maintained to ensure Epsom’s long term vitality and viability. These must meet the needs of the Town Centre and be appropriately located.

- **Policies and management approaches to improve the public realm and accessibility of the town centre**

  The public realm plays an important role in the character and attractiveness of the town centre and policies and actions will improve this and reinforce distinctiveness. The accessibility of, and movement around, the Town Centre is a key challenge and a comprehensive approach is set out to deliver improvements to the current position.

- **Management and promotion of Epsom**

  Improving the management and promotion of Epsom will help to reinforce its role as a high quality, family-friendly market town attracting visitors, shoppers, retailers and businesses to the town centre.

- **Utilising opportunity sites**

  There are a number of sites across the town centre whose redevelopment or improved management will positively contribute to delivering the visions.
The Role of Town Centre Management

4.4 From the early stages of Plan E, the development of a formal town centre management regime was identified as a key delivery mechanism for the regeneration of Epsom as a retail and commercial centre. Epsom currently has no formalised town centre management regime. Evidence from other towns demonstrates that effective town centre management and promotion contributes towards improvements to vitality and viability. Specifically, in those locations where town centre management has been successful, it has brought together public, private and voluntary partners to meet shared objectives.

4.5 The Council has actively sought to develop Plan E with its Local Strategic Partnership partners from the outset. Notably, the vision for Epsom Town Centre, set out under Core Strategy Policy CS9, is directly linked to the Community Strategy Vision for the Town Centre.

4.6 The LSP have been engaged in the production of Plan E through a focused Town Centre sub-group. Forthcoming changes to the structure of the LSP will see this sub-group evolve to become the Economic Delivery Group, which will seek to deliver Plan E. The Group is comprised of key management partners, including the Council, Surrey County Council and representatives of the local retail and business communities.

4.7 The role of the Economic Delivery Group will be to provide a link between the Council’s statutory planning functions, the Sustainable Community Strategy and the dedicated town centre management regime. The individual members of the group will be given specific tasks or objectives, as identified within Plan E. These agreed shared objectives will be subject to regular monitoring. The group will report back to the LSP board.

4.8 The Council considers that a Town Centre Manager will be a key member of the Economic Delivery Group. The creation of a Town Centre Manager post will be achieved during the first five years of the Plan E period. The Council and LSP partners will explore funding options for the post. One possible option is the establishment of a Town Centre Business Improvement District (BID) scheme. This will require the development of wider partnerships between the LSP and individual traders and businesses. Similar BID schemes have helped develop successful management regimes elsewhere. Initially, a BID schemes could focus upon the Town Centre’s core commercial area.

4.9 The manager post will be independent of the Council but might be directly linked to the LSP. The Town Centre Manager will help in co-ordinating the delivery of Plan E on the ground, acting as a further link between the LSP partners and the Town Centre’s communities. For example, the Manager will provide the link between the local traders and business and the LSP partners responsible for improvements to the transport networks and public realm. The manager will also provide a promotional link between Plan E, the LSP partners and new traders and businesses seeking to locate in Epsom.
Town Centre boundary and development management policies

Town centre boundary

Policy E1

The Town Centre boundary identifies the area to which the Plan E policies and Core Strategy policy CS14 principally apply. The Plan Area Boundary defines a wider area where some Plan E policies also apply.

In principle, Town Centre uses will be permitted within the Town Centre boundary, subject to other relevant policies. These uses will include retail, employment, higher density housing and community facilities. Mixed use proposals are encouraged, although single use schemes will be permitted where it can be demonstrated they will make a positive contribution and will not harm the vitality and viability of the town centre.

4.10 For planning purposes, it is important to define the extent of the Town Centre area. Defining a boundary will direct town centre uses such as retail, leisure and business to appropriate parts of the town. The identified Town Centre boundary encloses an area where these town centre uses are concentrated. The boundary excludes the predominately residential areas that surround Epsom Town Centre. Commercial, healthcare and education uses that are located beyond the boundary and are separated from the Town Centre by residential areas are also excluded.

4.11 The Council acknowledges that many of the areas outside of this boundary have important links with the Town Centre, for example Epsom Hospital, Rosebery Park and the University for the Creative Arts. Their exclusion by no means devalues their importance to the continued vitality and viability of the Town Centre.

4.12 The Town Centre contains a varied mix of uses, which support day, evening and night time activities. It is important that this mix is maintained and that new proposals positively contribute to the town centre’s vitality and viability.

4.13 The Epsom Town Centre and Plan Area boundaries can be seen on Map 8.
Land uses:

4.14 To help deliver the visions for the Town Centre, it is important that the right types and balance of uses are maintained and delivered. Opportunities for new development in the town centre are relatively limited and therefore competing uses must be carefully balanced in light of the needs that have been identified. The policies in the following section set out the level of provision for key types of land uses.

Housing capacity in the Town Centre

Policy E2

New development will deliver at least 635 new residential units within the Town Centre during the period between 2010 and 2026.

The key opportunity sites, as defined on the Proposals Map, will deliver a significant proportion of this as follows:

Upper High Street and Depot Road site: Approx 130 units
Utilities site, East Street: Approx 250 units
Epsom Station site: Approx 100 units

The remainder of the target will be delivered by the other opportunity sites identified by Plan E and existing housing commitments.

4.15 The Borough wide housing target is set out in the Core Strategy under policy CS7. The Town Centre will provide an important source of housing land supply to assist in meeting the targets set out within the Core Strategy. It is an appropriate location for higher density developments although delivering a mix of dwelling sizes will also be important to help meet the needs of the Borough. Town Centre housing sites could help to meet approximately 22% of the borough-wide housing target for the remaining plan period. Evidence from the current Annual Monitoring Report indicates that existing housing developments located within the Town Centre that are either committed or under construction will contribute about 12% towards the projected borough wide five year supply.

A dwelling that contributes towards the borough wide housing target is defined (in line with the 2001 Census) as a self-contained unit of accommodation. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household’s accommodation are behind a single door which only that household can use. Ancillary dwellings such as ‘granny annexes’ are included provided they are self-contained, pay separate council tax from the main residence, do not share access with the main residence (e.g. a shared hallway) and there are no conditional restrictions on occupancy. Establishments providing managed residential accommodation are not counted in the housing supply. These cover university and college student accommodation, hospital staff accommodation, hostels/homes, hotels/holiday complexes, defence establishments (not married quarters) and prisons. However, purpose-built (separate) homes (e.g. self-contained flats clustered into units with 4 to 6 bedrooms for students) are included. Each self-contained units should be counted as a dwelling.

The LDF Annual Monitoring Report 2008/09 Table 6: Housing Trajectory

With an extant planning permission
4.16 Potential sources of housing within the Town Centre have been assessed as part of the evidence base; Strategic Housing Land Availability Assessment (SHLAA)\textsuperscript{13} & Town Centre Health Check, and throughout the development stages of Plan E. This information has been used to identify a potential yield of new residential units from sites within the Town Centre. The Plan E Opportunity Sites housing phasing table is provided in Appendix 4.

4.17 The assumed yield of new residential developments in the Town Centre has allowed for a degree of variation. This means that flexibility can be exercised on individual opportunity sites, while allowing for other currently unidentified sources to come forward.

4.18 The opportunity sites are considered in greater detail in Chapter 5.

\textsuperscript{13} Epsom & Ewell SHLAA Para 4.2 Town Ward
Town Centre retail capacity

Policy E3

Epsom will maintain its position in the shopping hierarchy as a secondary regional centre. Its retail offer will reflect that of a quality market town.

The amount of retail growth in the town centre will be guided by the following:

Convenience goods: there is capacity for an additional 2,466 sq m by 2026. This is broken down into:
- 1,448 sq m by 2013
- 1,767 sq m by 2018 and
- 2,466 sq m by 2026.

Comparison goods: there is capacity for an additional 7,730 sq m by 2026. This is broken down into:
- 1,676 sq m by 2018 and
- 7,730 sq m by 2026.

Prior to 2013 there is no capacity identified for additional comparison floorspace.

Retail growth should be directed to the Primary Shopping Area in the first instance. All retail proposals must be subject to the sequential test, and those proposals above capacity in edge and out-of-centre locations must be tested robustly against the impact test (PPS4, 2009). The floorspace threshold must take account of the cumulative effect of recent permissions, developments under construction and completed developments.

4.19 Existing and future retail provision in Epsom Town Centre has been assessed through two recent retail studies. These have specifically examined the existing level of provision and how this meets the needs of the catchment population and how Epsom as a retail destination compares with surrounding competing centres. Additionally the future need for additional retail provision has been assessed. A glossary of retail terms can be found in Appendix 5.

4.20 The studies have found that:
- There is no requirement for major expansion of the primary shopping area
- The existing retail offer does not match the needs of the surrounding catchment area
- The overall objective should be on the enhancement of the existing building stock and adjoining public realm which will help attract quality retailers and enhance the shopper attraction, and will reinforce the image of Epsom as a quality market town
- Protecting the retail core will be important as there has recently been a loss of a number of key retailers.

14 The CACI Retail Study (2007) and Epsom Town Centre Retail Study (April 2009)
4.21 Consultation responses and sustainability appraisal support this approach. Therefore, the approach for retail in Epsom up to 2026 will include limited retail growth, which will be appropriately located to help reinforce the vitality and viability of the Town Centre along with policies to identify and protect the main retail areas. 3,000sq m of retail floorspace has been allocated in two of the strategic opportunity sites; 2,000sq m in the Depot Road and Upper High Street site and 1,000sq m in the Epsom Station site. In addition, policies to improve the public realm and to reduce the detrimental impact of motorised transport in the Town Centre will help to deliver a town centre which is safe and attractive to both shoppers and retailers.

4.22 The overriding objective is the enhancement of the existing composition of the Town Centre.

Town Centre Primary Shopping Area and Primary & Secondary Retail Frontages

Policy E4

Primary Shopping Area
This area, as defined on the Proposals Map, will serve as the Town Centre’s core shopping area. The area incorporates the Primary and Secondary Retail Frontages. Retail uses will form the dominant use within this area. The Council will actively encourage new retail to locate within this area.

Primary Retail Frontages
Within these frontages, as defined on the Proposals Map, the percentage of A1 units will not fall below 66%\(^\text{15}\). The Council will actively encourage a higher proportion of A1 uses within these frontages. Uses other than the A1, A2 or A3 uses, as identified by Use Classes Order, will not be permitted.

Secondary Retail Frontages
Within these frontages, as defined on the Proposals Map, new A1 A2 and A3 uses will be permitted. A5 uses will not be permitted. Other uses will be permitted provided they demonstrate that they:
- Will not harm the predominantly retail character and appearance of the frontage
- Contribute to the vitality and viability of that part of the Town Centre
- Will not result in an over concentration of such uses, so as to create a significant break\(^\text{16}\) in the retail frontage
- Will not result in an increase in anti-social behaviour
- Are compatible with the neighbouring uses.

This policy does not affect the continued operation of existing non-retail uses already present within the Primary Shopping Area.

\(^{15}\) This is a common approach for maintaining concentrations of A1 retail uses within defined primary retail frontages, on the basis that 66% is the minimum threshold required to maintain the viability of these frontages.

\(^{16}\) Generally no more than two adjoining units, but will be assessed on a case by case basis.
4.23 Defining the Primary Shopping Area 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 will ensure that shopping is maintained or enhanced as the predominant ground level use within this area. The Primary Shopping Area is shown on Map 8.

4.24 Epsom’s retail area is linear in form, with the Ashley Centre forming a major retail anchor at one end, while the Upper High Street shopping area, with its more diverse range of uses and lower footfall is at the other. Two major junctions (the Spread Eagle and the Quadrant) and High Street (east) separate these areas. New retail provision will need to be carefully located. For example if provision is increased significantly at the Upper High Street end of the shopping area, two competing centres may be created, leading to the decline of High Street (east). The location of new retail uses is considered in more detail in Chapter 5 Opportunity Sites.

4.25 Within the Town Centre shopping areas, survey evidence has shown that there has been a decline in the number of retail units (A use classes). In the year 2000, 70% of units had A class uses, while this has fallen to 58% in 2007. This suggests that the primary retail function of the town centre has become more diluted and further reductions should be avoided to ensure Epsom’s position as a secondary centre is maintained.

4.26 To help manage this, primary and secondary retail frontages have been identified within Primary Shopping Area. The primary frontages contain the highest proportions of retail uses and are focussed in the core of the retail area. The Ashley Centre and full stretch of the High Street are identified as primary frontages. Within this area, around 66% of the units were within A1 use in 2007 and to protect its continued function as the primary shopping area, further infiltration of A3/A4/A5 uses should be avoided.

4.27 The highest footfall is within the Ashley Centre and western part of the High Street. Comparably, the eastern part of the High Street is not performing as well in footfall terms and designating it as primary frontage will help to reinforce its role as a retail area.

4.28 The secondary frontages provide a greater opportunity for more diverse street level range of uses, including financial services, restaurants and beauty salons. South Street and Upper High Street are identified as secondary frontages. These areas tend to have a good quality and mix of specialist and niche independent retailers which is desirable and should be encouraged. South Street has a good representation of restaurants and pubs which adds to the vitality and character of the area. Threats come from the increasing infiltration of fast food takeaways (A5 uses), which undermine the mix of uses and vibrancy of these areas. For example, partially inactive, during daytime hours, security-shuttered shopfronts can have a negative impact on the character and appearance town centre high streets. Evidence\textsuperscript{17} demonstrates that fastfood takeaways already have a strong presence in parts of the Town Centre. Upper High Street in particular has experienced this. Uses such as takeaways do have a role to play within the Town Centre, but their locations are more suited to being outside the primary and secondary frontages.

\textsuperscript{17} The Epsom Town Centre Retail Study and Health Check (April 2009) (Chapter 7)
4.29 Areas which fall within the Primary Shopping Area, but are not defined as being within the primary or secondary frontage provide flexible locations suitable for a range of retail, leisure and other town centre uses.

4.30 The retail area and primary & secondary retail frontages are shown on Map 8.
Town Centre employment floorspace provision

Policy E5

New development will deliver around 6,000 sq m of new employment floorspace within the Town Centre during the period until 2026.

Within the Town Centre boundary, as defined on the Proposal Map, the loss of existing employment floorspace will be resisted.

Proposals that seek to redevelop aging upper floor office floorspace for retail, other commercial A class uses or non-commercial uses will be considered providing the following are demonstrated:

- That there is a sufficient supply of high density employment floorspace within the Town Centre to meet the needs generated by future population growth
- That the proposal site is no longer fit for purpose as Town Centre office stock
- That the existing office use has been subject to an active marketing exercise lasting at least twelve months, prior to alternative uses being considered.

4.31 Evidence\(^{18}\) has shown that there is an under-provision of suitable employment floorspace within the Borough and there is relatively little scope for large scale additions. A large proportion of the Borough’s office stock is located within Epsom Town Centre, which is a good location for these high density employment uses, being well related to the existing transport network and making a valuable contribution to the local economy. Core Strategy Policy CS11 seeks to protect the amount of employment floorspace, resisting losses in sustainable locations such as the Town Centre.

4.32 There are two types of provision; traditional office stock on the upper floors of buildings, above shops and purpose built office developments. Only a very small proportion of the stock has been built since 1991 and while some of the stock is well maintained, others require improvement. Some of the aging office stock above shops may no longer meet modern serviced office needs.

4.33 The provision of new office stock must be balanced against other competing town centre uses. The development of new office provision may allow the release of aging stock to other appropriate town centre uses. Local commercial agents have told the Council that there is market demand for new modern serviced offices. However, there should be no overall net loss. Opportunity sites for new office provision within the Town Centre are limited, although provision for new employment floorspace has been identified within the larger sites. 5,000sq m of commercial floorspace has been allocated in the Utilities Site, East Street and 1,500sq m within the Station Site, Epsom.

4.34 As employment markets change, alternative high density commercial uses that can take advantage of Town Centre locations will be considered. Recently,

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there has been market demand for new hotel accommodation\textsuperscript{19} within the Town Centre. The Council considers this to be an appropriate high density commercial use for the Town Centre, subject to there being clear demonstrable need. Opportunity sites where new hotel accommodation could be located are considered under Chapter 5.

4.35 The Council will monitor the levels of provision of office floorspace, ensuring that the Town Centre has a sufficient supply to meet demand.

Leisure, cultural and community facilities provision

Policy E6

The overall level of leisure provision within the Town Centre will be maintained and in specific locations enhanced. Suitable locations for enhancement include South Street, Upper High Street and Derby/Oaks Square.

Leisure and cultural facilities, and other family friendly uses that contribute to the evening economy will be supported.

4.36 Epsom has a good range of leisure, community and cultural uses spread across the Town Centre, these include the Epsom Playhouse, library and the Odeon Cinema. The Council has not identified any obvious gaps in provision. Retaining the existing facilities in the Town Centre will ensure that these uses remain accessible and encourage linked journeys, and increased dwell times, to the Town Centre.

4.37 A thriving evening economy helps encourage longer dwell-times in the Town Centre. Epsom is keen to promote itself as a safe destination for families and as such, family orientated developments will be welcomed, while an over concentration of late night venues which could lead to an increase in noise, disturbance and antisocial behaviour will be avoided.

Town Centre building height

Policy E7

The areas where there are opportunities for higher buildings, up to a maximum height of 16 metres\textsuperscript{20}, are indicated on the Proposals Map.

Elsewhere within the Town Centre Boundary, buildings will be a maximum of 12 metres\textsuperscript{21}.

\textsuperscript{19} Expressed through a series of recent planning applications.
\textsuperscript{20} The broad equivalent of a commercial scale four storey building
\textsuperscript{21} The broad equivalent of a commercial scale three storey building
The above maximum heights are defined as the distance between ground level and the buildings eaves/ gutter.

Above the maximum heights, the roof of the building will be no higher than 4 m and the slope of the roof will be no greater than a 45° pitch.

Building up to the maximum heights stated may not be appropriate in every location. In addition it may not be appropriate for the roofspace to be utilised as an additional storey. Proposals must respect:
- The character and context of the surrounding locality, particularly in relation to existing building heights and rooftops
- The impact on the streetscene and views
- The Conservation Area (where applicable)
- Listed buildings and the setting of listed buildings
- Topography

4.38 The character and appearance of the Town Centre plays an important part in making it a successful place. The different parts of the Town Centre each have their own distinctive character. The visions for the key town centre areas draw out a number of these elements, building upon recent Conservation Area Appraisals and their associated management plans. The Council will apply Core Strategy Policies CS5 and CS6 to ensure that the design of new developments has a positive impact upon the Town Centre.

4.39 The scale of the buildings in Epsom Town Centre is a particularly important characteristic. While there is variation in building heights across the Town Centre, a key feature is the overall, relatively low building height. While it is the aim of the Council to preserve this locally distinctive characteristic, it is not the aim to deliver uniform heights. The Council will welcome new development which respects its surroundings, the overall low heights and makes a positive contribution to the character of the Town Centre. The Council has drawn upon a number of sources of evidence in support of this policy approach. A recent CABE design review of a large scale development proposal located within the Town Centre supports this position.

4.40 The visions for the key character areas provide descriptions of character and building heights and this, along with the Town Centre Conservation Area Appraisal and a height survey of the Town Centre has been used to inform the development of Policy E7.

4.41 It should be noted that the existence of a higher building in a particular location does not justify its replacement with a building of equivalent height, or for new high buildings in the same area. Areas where maximum height buildings will be considered are set out on Map 9. In relation to building height, proposals which fall across and/or are immediately adjacent to the maximum height boundaries will be considered on a case by case basis. Discussions with the Council at an early stage are encouraged to ensure appropriate heights are achieved.

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22 Town Centre Conservation Area Appraisal and Management Plan and Epsom Town Centre Survey of Building Heights
23 Commission for Architecture and the Built Environment (CABE)
Town Centre energy generation

Policy E8

Future development proposals within the Town Centre will fully assess the potential to incorporate decentralised or renewable energy generating sources and where feasible, these sources will be provided as part of new developments.

New decentralised and renewable energy sources will be designed to have the capability to contribute to a wider local energy network and/or the National grid.

Where community Combined Heat and Power (CHP) schemes are demonstrated as not being viable, new developments will be designed and built with the capability to connect into such a network at a future date.

4.42 The Climate Change Bill 2008 commits the UK to binding green house gas emission reductions of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020 against a 1990 baseline. The Council has adopted the Surrey Climate Change Strategy and a local Climate Change Action Plan, which will set out a comprehensive programme of measures to reduce carbon emissions. Increasing the opportunities for sustainable sources of locally generated power has a positive role on mitigating the impacts of climate change.

4.43 Over 80% of the Borough’s carbon emissions are estimated to be from domestic and industrial / commercial sources, and therefore reductions in this area will be essential to reduce carbon emissions. Whilst specific Borough-wide development management policies relating to carbon reduction and renewable energy for new development will be contained in future Borough-wide development plan documents, Plan E identifies opportunities for carbon reduction within the Town Centre these are set out under Chapter 5. The Town Centre has a high intensity of uses and therefore presents a key opportunity to deliver an increase in decentralised and low carbon energy.

4.44 Ideally an Epsom Town Centre energy network will be achieved. Although there are currently no firm plans in place to deliver such a network, the Borough’s Climate Change Strategy will consider the delivery of decentralised energy networks in greater detail. Nevertheless, opportunities to achieve carbon reductions through new development will be sought; for example through CHP energy generation schemes. This will ensure that the potential remains to link into a wider town centre energy network at a future date.

4.45 Due to the designation of a large proportion of the Town Centre as a groundwater source protection zone, the use of Ground Source Heat Pumps as a form of renewable energy generation will be treated with caution. Developers intending to utilise this form of heating are advised to consult the Environment Agency at the earliest opportunity.

24 Local Area Carbon Emissions Reduction Report, Energy Savings Trust (June 2009)
25 Combined Heat and Power is a form of de-centralised energy, which seeks efficiencies by serving as both a power and heat source for buildings.
Public realm

Policy E9

The Council will work with partners to ensure a high quality, well designed and well connected public realm, to improve the character, appearance and overall attractiveness of the Town Centre.

Proposals for new development will, where appropriate deliver:
- The rationalisation of existing street furniture and paving
- Biodiversity enhancement, particularly through planting and the creation of green corridors
- Public art at prominent locations throughout the Town Centre and through the design of new buildings
- Improvements to the visual attractiveness and use of public open space,
- Improvements to the visual appearance of buildings in the town centre, particularly those within the Conservation Area in line with the Conservation Area Appraisal & Management Plan.

Developers are encouraged to discuss with the Council at the earliest opportunity which public realm enhancements may be the most appropriate, as improvements may be made as part of a scheme, through financial contributions or a combination of both.

The Council has produced a schedule of public realm improvements for the Town Centre as part of Plan E’s Infrastructure Delivery Plan. New development proposals within the Town Centre boundary will make a financial contribution to these public realm improvements in accordance with the Developer Contributions Supplementary Planning Document, or whichever future mechanism is adopted.

4.46 The public realm, the spaces around and between buildings including streets, squares and parks, has a major part to play in the character, appearance and attractiveness of a town. As well as being able to move around easily, it is important that people of all ages and abilities feel the Town Centre is a safe and welcoming place.

4.47 While Epsom is considered to generally have good public areas there are plenty of opportunities for improvements to help deliver the vision for the Town Centre, and reinforce its image as a high quality market town. A vast proportion of the Town Centre is designated as a Conservation Area and the associated Management Plan identifies a number of improvements.

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26 The Plan E Infrastructure Delivery Plan (IDP) is available on the Council’s website.
Reducing street clutter and delivering a coordinated appearance

4.48 Over the years there has been a build up of traffic signs and street furniture, which has resulted in a cluttered uncoordinated appearance. Paving quality varies across the Town Centre, with some areas benefiting from attractive durable York stone, while others are paved with concrete slabs, briquettes or tarmac. Collectively this leads to a haphazard appearance which does not reflect well on the town centre.

4.49 The approach to address this will involve:

- Rationalising street furniture to remove redundant items and integrate where possible or relocate where needed, the essential elements
- The Council working in conjunction with Surrey County Council and other relevant partners to develop an ‘Epsom Code’ which identifies an approved list for town centre street furniture items and materials including paving. This will reflect the character of the particular parts of the town centre as identified in the visions and ensure consistency. For example High Street west and High Street east could have specific styles of street furniture to complement and reinforce their individual character. The Epsom Code will be applied to new development proposals and as part of the on-going maintenance regime.

Biodiversity enhancement

4.50 Providing biodiversity enhancements is a key element in the development of sustainable communities. As well as addressing climate change, biodiversity enhancement has a positive role in improving visual character and appearance.

4.51 Within Epsom’s urban areas, trees and other planting are the most visible contribution to biodiversity. Surrey is the most wooded county in England but existing tree planting in the Town Centre is surprisingly limited. Nevertheless, the Town Centre includes a number of significant trees that make a positive contribution to the Conservation Area and wider townscape. The opportunity for new planting is often restricted because of underground services.

4.52 The approach to address this will be:

- Protect existing trees and planting. Losses must be replaced by new increased/ improved planting
- New planting will be integrated into development sites
- Green corridors will be created to the green spaces within or surrounding the Town Centre and to existing areas of trees, for example along Ashley Avenue towards Rosebery Park, or along Church Street to Dulshott Green
- New trees will be planted where there are current opportunities or where they may arise, for example the Town Hall Square, or where pavement widening provides a viable opportunity
- Seek biodiversity enhancements as an integral part of new developments. Such enhancements could include the incorporation of green roofs and walls, and the creation of wildlife habitats as part of the buildings design.
Public art

4.53 Public art contributes to the identity of a town, helping to make it locally distinctive and helps to prevent becoming a ‘clone town’\(^{27}\). Examples of public art can include sculpture installations, murals, distinctive street furniture and lighting. Public art can also be embedded within the townscape forming an integral part of building design. In this respect it can be incorporated within building materials and shop signage. Public art can also contribute towards the Town’s image. For example, Epsom has a long relationship with the horse racing industry and equestrian themes can serve reinforce this association. Epsom currently has limited public art for a town of it size. Suitable locations for public art in the town centre are listed in the Infrastructure Delivery Plan.

- Encourage artistic details to be included in the design of new buildings
- Working with partners to deliver new public art in the form of sculptures and murals in desirable locations across the town to act as focal points and add interest
- Agree a series of unifying themes that reflect the Town Centre’s historic character and appearance and contribute towards the image of Epsom as a family orientated market town.

4.54 Potential locations for new public art are shown on Map 10.

Improving the attractiveness of existing public spaces

4.55 There are a number of public spaces in the town centre which are focal points for activity, these include the Market Place and Derby Square. These spaces are a haven for pedestrians, providing shelter from the impact of traffic. However, many are not being used to their full potential. By introducing public realm improvements to these areas, pedestrian footfall and dwell-times will increase. These areas are covered in detail under Chapter 5.

4.56 Examples of the types of improvement proposed for these areas include:

- **Market Place**: improvements to existing treescape and planting, potential for further additional planting in place of the existing deterrent paving; providing permanent / semi permanent stalls or storage for the market stall equipment; providing the facilities to use of the area for events, exhibitions and displays for example; and delivering public art
- **Derby Square**: Increase the amount of public seating, visual improvements to the entrance to Derby Square from High Street (east) – possibly through new public art, additional seating or street trading
- **Town Hall Square and car park, rear of Town Hall**: new planting and improved surfacing and street furniture. Further improvements to the public realm are listed in the Infrastructure Delivery Plan.

\(^{27}\) The New Economics Foundation has defined clone towns as being characterised by having homogenised town centre shopping areas that lack local distinctiveness.
Maintaining a high quality appearance of buildings

4.57 The Town Centre’s public realm is enhanced by its numerous attractive buildings, a considerable proportion of which form part of the Town Centre Conservation Area. However, a small number of Town Centre buildings and structures are in poor visual condition and would benefit from refurbishment or maintenance. Equally, there are variations in the quality of existing shop fronts throughout the Town Centre, some of which detract from the quality of the wider Town Centre.

4.58 Potential approaches for addressing this issue include:

- Working with property owners and occupiers to maintain and improve the appearance of buildings. Such an initiative could be pursued by the Council’s Conservation function in conjunction with the Town Centre Management regime
- The development of a shop front strategy and design guide to specify the standards for shop front design across the Town Centre.

Accessibility

4.59 The A24, a primary route runs through the heart of the Town Centre. This currently operates as a one way system, flowing through the historic Old Town and Market Place. The A24 is congested during peak periods, although at other times traffic can be free flowing. Traffic volumes and congestion have a detrimental impact on the Town Centre environment, creating barriers to pedestrian movement and reducing air quality. The Town Centre is difficult for cyclists to negotiate and the availability of cycle parking is limited.

4.60 In spite of high peak time traffic congestion and volumes, the Town Centre is highly accessible to cars. There are a wide number of public and private car parks across the Town Centre that provides a range of short – long stay provision. The public car parks are supported by a variable messaging system that guides visitors to available parking spaces.

4.61 It is important that the Town Centre remains accessible to all forms of transport, while also being a pleasant place for pedestrians. A number of objectives have been identified in Plan E and this section sets out how these will be delivered.

4.62 Modal shift, away from the private motor car to public and alternative transport modes will be gradual and only likely to take place in the long term. Therefore the Council and its partners recommend an incremental approach, delivered through a variety of actions over differing periods of time. It is important the approach is flexible, to take account of changing circumstances and opportunities that may arise over the plan period. Monitoring the impact of the actions will be essential to assess the impact of actions and identify any additional opportunities. Accessibility issues are set out on Map 11.
Pedestrian movement

The Council will work with partners to deliver the following improvements:
- Ensure that existing pedestrian routes are safe, well maintained and appropriately signed.
- Improve accessibility for pedestrians at key junctions, in particular across the Spread Eagle and Quadrant junctions.

4.63 Ease of pedestrian movement throughout a Town Centre is important to ensure continued economic success. Epsom is generally well provided for in terms of pedestrian routes and linkages. However, the A24 creates a number of barriers to movement, particularly across key junctions. The signing and maintenance of a number of pedestrian routes could also be improved. Proposed improvements to the pedestrian environment are listed in the Infrastructure Delivery Plan.

4.64 The approach to address this will be:
- Ensure existing pedestrian routes are well maintained, safe and signed where appropriate
- Deliver improvements to accessibility for pedestrians at key junctions, for example pavement widening
- Improve pedestrian permeability through the development of key opportunity sites, for example the Utilities Site on East Street
- Explore the potential removal of obstacles to pedestrian movement, such as the central reservation barrier in High Street (east).

Improving accessibility and facilities for cyclists

Policy E10

The Council will work with partners to improve:
- Cycle access both into and throughout the town centre, and
- The availability of cycle parking facilities across the town centre
- Accessibility to public transport, particularly through improvements to Epsom Station and its links with the surrounding areas

Developers will contribute towards the delivery of the above policy, and are encouraged to discuss with the Council at the earliest opportunity which improvements may be the most appropriate. Improvements may be achieved physically as part of a scheme, through financial contributions or a combination of both.

The Infrastructure Delivery Plan identifies a number of improvements. Financial contributions should be made in accordance with the Developer Contributions Supplementary Planning Document, or whichever future mechanism is adopted.

4.65 The road layout in the Town Centre presents a challenge for cyclists with the current volumes of traffic and road widths restricting the opportunity for improvements. However, opportunities to improve routes for cyclists do exist.
and others may arise in the future subject to reductions in motorised traffic volumes, changes to traffic routes and through new development. The current level of informal parking of cycles around the Town Centre serves as an indicator that dedicated cycle parking is underprovided.

4.66 The approach to address this will be:

- Increase the level of cycle parking provision within the Town Centre
- Improve cycle routes through the Town Centre where current opportunities exist, for example introduce shared cycle path and footway along East Street and a contra-flow lane along Station Approach
- Improve cycle permeability through opportunity sites, for example the Depot Road and Upper High Street site
- Monitor traffic volumes and flows throughout the Town Centre to identify potential opportunities for additional dedicated cycle routes, should circumstances allow.

**Promoting the use of public transport**

4.67 Improving the attractiveness of the use of public transport will help to reduce carbon emissions and congestion. There are many factors that influence people’s choice of transport and some may be harder to address than others. For example the routes, frequency and cost of services are all key influencing factors and ensuring these are addressed is best achieved through partnership working. However, there are a number of other factors which can influence the attractiveness of using public transport, which can be more specifically addressed in Plan E.

4.68 The approach to address this will be:

- Work with developers to deliver a new and improved railway station for the Town, incorporating improved pedestrian links with the town centre as part of the development of the station opportunity site (see Chapter 5)
- Ensure bus stops and layover bays, and taxi facilities are well located to meet needs. For example some bus routes may be used more by commuters and therefore should be nearer the station, while others may be used by shoppers and therefore best located more centrally
- Seek to deliver a Public Transport Information System\(^{28}\) for buses to provide real time information
- Consider the impact of changes to the highway network on bus movements, seeking improvements both in terms of routes and timings.

**Addressing illegal parking**

4.69 Illegal on-street parking is a significant cause of congestion, creating bottlenecks that impact on the wider Town Centre road network. There are areas in the Town Centre where this problem is particularly acute, for example

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\(^{28}\) Such systems provide a real-time display of in-coming bus services and their time of arrival. This can help to make bus services more attractive to passengers.
along High Street\textsuperscript{29}. Addressing this will help to keep the traffic flowing more freely.

4.70 The approach to address this will be:

- Increasing illegal parking enforcement through on-street ticketing and potential use of CCTV for remote enforcement. This also may include the future consideration of measures such as the introduction of ‘red-route’ type parking restrictions
- Developing a parking strategy to ensure that existing public parking provision, both on and off-street, is optimised.

Deliveries to premises

Policy E11

The Council will work with its partners to reduce Town Centre traffic congestion due to obstructions on the highways, such as illegally parked cars and delivery vehicles.

New developments will provide servicing arrangements that ensure that delivery vehicles do not cause an obstruction to the Town Centre highway network.

4.71 As with illegal parking, delivery vehicles servicing Town Centre commercial and residential uses from the street can also create bottlenecks along the A24 that result in congestion across the Town Centre. Premises need to be serviced to operate but improving how this is carried out and the timing of this can help reduce the impact on the transport network.

4.72 The approach to address this will be:

- Working with the business community to minimise the disruption of delivery vehicles, for example by encouraging use of rear servicing arrangements where they are available
- Review the use of parking orders to restrict deliveries to certain times, in conjunction with parking enforcement measures
- Seek opportunities to provide rear servicing where they currently do not exist, such as to the rear of the Town Hall.

Town centre parking

Policy E12

The Council will work with Surrey County Council and other partners to prepare a parking strategy for the Town Centre.

New development that generates vehicle trips will take full account of this strategy once produced. New Town Centre parking provision will adhere to the management and charging regimes set out within this strategy.

\textsuperscript{29} Analysis of congestion demonstrates that illegal on-street parking along High Street (east) can effectively narrow the A24 from two to one operational carriageways.
4.73 It is important that the approach to parking provision in the Town is clearly informed to help balance competing aims and demands, such as town centre vitality and viability, accessibility, impact on adjoining residential areas, sustainability and revenue. Currently the approach is not comprehensive.

4.74 The approach to address this will be to prepare and implement a parking strategy, which will seek to meet the following objectives:

- Provide sufficient parking provision to meet the needs of the Town Centre's uses and their users;
- Encourage sustainable travel patterns that help to reduce traffic congestion and volumes, and contribute to carbon reduction;
- Contribute to the Town Centre's continued long term economic viability;
- Optimise the use of existing public parking provision;
- Reduce the levels of commuter parking that are currently displaced to the residential areas surrounding the Town Centre, and;
- Provide a clear link between the parking strategy and development related parking standards.

Strategic traffic routes

4.75 A proportion of the traffic that enters the town centre is just passing through. Highlighting alternative routes for such traffic within the existing road network can contribute to volume reduction (e.g. vehicles approaching from the north of the Borough on the A24, wishing to join the M25). Furthermore, the Kiln Lane Link30, an existing major scheme which is awaiting Government funding, could in addition to reducing traffic volume in Ewell Village, also help reduce vehicle movements on Hook Road and East Street on the north-east side of town. Delivery of this scheme would help to provide an additional route across the railway line, which would ease the pressure on the existing crossing points, these being Hook Road and Ewell Village.

4.76 Heavy goods vehicles have a particularly detrimental impact on the environmental quality of the town centre, so finding ways to reduce their need to pass through the town centre can be beneficial; for example vehicles carrying waste bound for the Blenheim Road waste transfer station.

4.77 The approach to address this will be:

- Improving strategic signage, to sign alternative routes avoiding the town centre
- Work with the freight quality partnership to reduce the number of heavy goods vehicles passing through the Town Centre
- Delivery of the Kiln Lane Link which could reduce traffic volumes and heavy goods vehicle trips in Hook Road.

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30 This is a major road improvement scheme that seeks to provide a direct north-south link between Longmead and Nonsuch Trading Estates, which to the east of the Town Centre between Epsom and Ewell. If built the link road will remove the need for HGV traffic bound for these Industrial Estates to travel through the Town Centre. The Core Strategy identifies the Kiln Lane Link under Policy CS16.
Changes to the road network

Policy E13

The Borough Council will work closely with Surrey County Council and other partners to investigate alterations to the highways network to help reduce the impact of traffic passing through the Town Centre. This will involve detailed testing of returning two-way traffic to South Street.

In the interim, development proposals that would prejudice the return of South Street to two-way traffic will not be permitted.

4.78 A number of options were considered in the development of Plan E to investigate whether the current traffic routes can be improved, both to improve traffic circulation and reduce the detrimental impact of traffic congestion and volumes on the retail environment.

4.79 Based on findings from the Epsom PARAMICS\(^{31}\) traffic model, the Council and Surrey County Council are working together on highway improvements which will reduce traffic congestion through the Town Centre. Two initial projects include signal re-phasing on the westbound approach to the Spread Eagle junction along High Street and provision of signal controls on West Street junction with Station Approach will lessen vehicle journey times through Epsom by reducing queue lengths and enhancing network efficiency.

4.80 The approach set out below identifies additional potential changes to the network which will be investigated over the Plan E period. How these changes are assessed and implemented will be influenced by many factors, including the success of other wider policies and long term goals such as achieving significant traffic reduction. Consequently the operation of the highway network will need to be carefully monitored to ensure that future intervention is timely and effective.

Time frame 2010 – 2015

- **Investigate restricting the left turn High Street (west) into Waterloo Road**

  Currently, a limited number of vehicles make this turn and the current arrangements are unsatisfactory for pedestrians (limited sight lines). Placing restrictions on ability of traffic to take the left turn could provide opportunities for improving this area, for example by widening the pavement, providing a cycle lane, and additional planting. The Council notes that a number of buses make this turn so it may be appropriate to secure an appropriate alternative route.

- **Investigate the return of South Street to two-way traffic in greater detail**

  Early modelling to inform the choice of options in Plan E has shown this scheme to have a number of benefits for both traffic and the Town Centre.

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\(^{31}\)**PARAMICS** is a micro-simulation model used to test the impact of changes to the highway network.
environment. It could reduce volumes of traffic passing through High Street (west) by around a third. This would help to reduce the negative impact of high volumes of often stationary/slow moving traffic in the Market Place area, making it more attractive for pedestrians. It could also potentially eliminate the need for a right turn from High Street (west) onto Ashley Road. This again could provide opportunities for environmental improvements in this area, making what is currently a wide junction more pedestrian friendly. Further modelling and design feasibility needs to be carried out, as there are a number of issues which need to be resolved, such as routes for buses and taxis. A major benefit would be the potential to reduce the area of carriageway needed to carry the remaining traffic along High Street (west) between West Street and Waterloo Road which would allow extensive footway widening and a potential contra-flow cycle lane. This would serve to significantly improve the environment for shoppers and other visitors to the town centre.

**Time frame 2015 onwards**

- **Investigate the possibility of further alterations to the highway network should a significant reduction in traffic volumes be achieved**

In the development of Plan E other options were considered which would help reduce the amount of traffic passing through High Street (west). To enable current traffic volumes to be accommodated within the network, achieving such options would be costly, requiring land take and the demolition of buildings, some of which are nationally and locally listed. This would have a negative impact upon the Town Centre’s historic environment. However, these options could be considered if a significant reduction in traffic volumes were to be achieved during the Plan E period, which would allow them to come forward within the confines of the existing highway infrastructure.
**Management and promotion of Epsom:**

The Council and its partners will work together to establish a form of town centre management for Epsom Town Centre. This will include the appointment of a dedicated town centre manager, who will play an active role in promoting the town centre and delivering the vision.

**The Council will work with the Business Partnership and Surrey chamber of Commerce to investigate the possibility of establishing a BID for Epsom town centre.**

4.81 To assist in the delivery of Plan E a more robust form of town centre management is being established, which will help draw together and coordinate the actions of the public, private and voluntary sector. While the management will have an overseeing role over the delivery of many of the policies contained within Plan E, they could also play an important role in:

- Developing a marketing strategy and actively promoting Epsom as a quality shopping destination for both retailers and shoppers
- Working with owners of vacant retail units to ensure they are filled with suitable tenants
- Working with the Business Partnership to deliver and promote bespoke events for the town centre, such as the successful ‘Taste of Epsom’
- Seeking to improve the evening night time economy through pursuing quality standards such as the Purple Flag initiative (Association of Town Centre Management)32

4.82 The above contribute towards making Epsom a high quality family orientated market town.

4.83 In addition to the above, the possibility of establishing a Business Improvement District (BIDs) for Epsom will be investigated as possible funding stream for the Town Centre Management regime.

4.84 The Council notes that BIDs have been created in many town centres across the UK.

4.85 Establishing a BID can be a lengthy process and not all attempts are successful. The majority of businesses must vote in favour of establishing a BID and the amount of revenue generated, significant enough to deliver worthwhile improvements. However, if a BID is viable and supported by the majority of local businesses, there can be many benefits to businesses, the local authority and the wider community. Once established, local authorities play an important facilitating role, calculating, collecting and enforcing the BID levy, passing the funds directly to the BID partnership organisation. Further information on establishing a BID can be found from the National BIDS Advisory Service (www.ukbids.org).

4.86 A BID for Epsom Town Centre could help deliver improvements that will strengthen the local economy and consolidate its position within the retail

32 This is a recently introduced ‘gold standard’ that recognises great entertainment and hospitality areas at night. It is being administered by the Association of Town Centre Management – www.atcm.org
hierarchy. The Council will work with the business community, principally through the Business Partnership and Surrey Chamber of Commerce to investigate the potential of establishing a BID for Epsom.
CHAPTER 5: Opportunity Sites

Strategic opportunity sites

Depot Road and Upper High Street

Policy E14

Proposals for the redevelopment of the Depot Road and Upper High Street strategic site, as defined on the Town Centre Proposals Map, will require delivery of the following:

1. A total of 2,000 sqm of retail floorspace that will allow for a mix of small retail units and a small-medium sized foodstore;
2. A minimum of 130 new dwellings, including at least 52 new affordable homes to meet local needs (see Core Strategy Policy CS 9);
3. Replacement of the existing 28 homelessness prevention flats;
4. A new medical centre that serves the wider Town Centre;
5. A new place of worship;
6. Relocation of the following existing on-site uses, CMB Motors, HSP holistic health centre and Work Action;
7. Rear service access arrangements for all new developments;
8. Improvements to the pedestrian crossing arrangements at the Quadrant junction as approved by the Highway Authority;
9. Traffic calming and management measures within the development site and locality as approved by the Highway Authority;
10. Integrated footpath and cycleway networks that provide connections to existing networks on Upper High Street and Church Street;
11. The retention of important existing trees, provision of additional tree planting and landscaping, involving the planting of native species;
12. Surface water flood risk mitigation measures that meet the requirements Council’s Surface Water Management Plan and the Environment Agency;

5.1 The allocation site is currently controlled by a number of landowners, including both the Council and Surrey County Council. There are a variety of uses across the site, including public car parking, homelessness prevention housing, a place of worship, a fire station, two private members clubs, an electricity sub station and vacant urban land. The comprehensive redevelopment of the site will contribute towards the regeneration of the Upper High Street vision area and wider Town Centre.

5.2 It is proposed to allocate a site with a gross area of about 2.5 ha for a mix of uses, comprising small retail units and a foodstore, about 130 dwellings, a new medical centre and 425 public car parking spaces. This strategic site is defined on Map 12.
5.3 The regeneration of the site will deliver additional retail units and a small-medium foodstore. This will meet the levels of identified need during the Plan E period. The delivery of these new retail uses will enhance the retail offer across Upper High Street, attracting new shoppers to the vision area and increasing footfall. The development of these retail uses will also deliver improvements to the pedestrian links between Upper High Street and the wider Town Centre; specifically to the crossing arrangements at the Quadrant junction.

5.4 The development will provide a reasonable mix and balance of housing types and sizes that will meet a range of housing needs. These new residential uses will be located across the site, forming part of the mixed-use retail uses along Upper High Street and fronting Church Street. The residential element will also deliver of new affordable housing to meet local needs, in addition to the re-provision of the existing on-site homelessness prevention accommodation. The Council’s preferred approaches for achieving this objective are set out within the Core Strategy33.

5.5 The existing Ashley Centre Surgery serves the Town Centre and surrounding areas. However, the Surgery is at capacity and the Council understands that its accommodation is inadequate. The comprehensive redevelopment of this site provides an opportunity to meet the Town Centre’s long term health needs through the relocation of the Ashley Centre Surgery. There is potential to deliver this shared objective by working with LSP partners, including the County Council.

5.6 The site area includes the United Reformed Church on Church Street. The existing building no longer meets the requirements of the Church, who are actively seeking to replace this place of worship with a new building. The redevelopment of this part of the site would deliver a new place of worship, funded through a residential enabling development that would contribute towards the wider site’s overall housing objectives.

5.7 There are a small number of existing on-site uses that make a valuable contribution to the Town Centre these include a motor vehicle servicing garage, a holistic health centre and specialist employment provision for the disabled. The redevelopment of the site provides an opportunity to retain these uses within the Town Centre by providing them with new accommodation that will meet their future needs.

5.8 The Depot Road and Upper High Street public car parks form a considerable element of the site. The enhancement of this long-stay public parking provision will benefit the wider Town Centre. To ensure that the use of this public parking provision is optimised and that sustainable travel patterns are encouraged, all public parking provision will be subject to a unified Town Centre wide parking management strategy and charging regime. This will also include all new retail related parking provision.

5.9 Access arrangements onto and through the site will incorporate off-street rear service access to service the new developments. This will reduce the impact of on-street deliveries and servicing upon the wider Town Centre highway network.

33 The Council’s approach to affordable housing and meeting housing needs is set out under Core Strategy Policy CS9.
5.10 Improvements to the pedestrian crossing arrangements at the Quadrant will increase the levels of accessibility between the Upper High Street Vision area and the wider Town Centre. They will seek to improve the crossing arrangements, making it easier and safer for pedestrians to cross this busy junction. This will help make the vision area more attractive to shoppers and increase footfall. It will also increase the potential for linked trips and longer dwell-times across the whole of the Town Centre.

5.11 Within the development the provision of traffic management and calming measures will need to be provided to standards required by the highway authority. Improvements to the footpath and cycle route network will increase access across the site. In particular, public realm, signage and lighting improvements to existing routes between the site Upper High Street, Pike’s Hill and Church Street and the car parks will make it easier for visitors to move across the Town Centre. The Council will explore the potential viability for new pedestrian and cycle routes through the site.

5.12 The comprehensive redevelopment of this site provides an opportunity to introduce significant biodiversity improvements to this part of the Town Centre. This will make a valuable contribution towards the enhancement of the Town Centre’s character and appearance in addition to meeting the Council’s wider Biodiversity Action Plan objectives. Retaining existing trees and planting, in conjunction with new planting across the site will meet part of this objective. Innovative measures such as the incorporation of green roofs or walls, and wildlife nesting boxes within the design of new buildings would also enhance biodiversity.

5.13 The Town Centre has a higher level of surface water flood risk than other parts of the Borough. This area of higher flood risk is identified within the Epsom & Ewell SFRA and will be the subject of a Surface Water Management Plan. Developers will work with the Council and the Environment Agency from an early stage to agree surface water disposal requirements and mitigate any negative impacts upon flood risk associated with the redevelopment of the site. Developers are advised to contact Thames Water at an early stage to resolve foul drainage problems.

5.14 The Town Centre is the most densely developed part of the Borough, containing a wide variety of different uses that have a constant heat and energy need. In order to meet these needs and at the same realise longer term carbon reduction targets opportunities for decentralised energy production and combined heat and power will be pursued. The size of the Depot Road and Upper High Street allocation, the mix of uses proposed and the high energy and heating demands of neighbouring uses, such as the cinema, suggest that this objective can be met.

5.15 The redevelopment of this strategic site also provides an opportunity to deliver exemplar energy efficient buildings that have carbon reduction measures fully integrated into their design and construction. The future Delivery DPD will set appropriate and viable targets for carbon reduction through design, taking account of the Code for Sustainable Homes, Building for Life and BREEAM standards. These targets will be linked to the Council’s Climate Change Strategy. Developers are advised to factor in the cost of these essential measures when purchasing sites for redevelopment.
5.16 A development brief will be prepared for this area in conjunction with partners, including the County Council and developers. It will include detailed advice on the distribution, phasing, design and density, accessibility, public realm, biodiversity, surface water disposal, flood risk and landscaping.
The Utilities Site

Policy E15

Proposals for the redevelopment of the Utilities site, to the north of East Street, as defined on the Town Centre Proposals Map, will require delivery of the following:

1. A minimum of 5,000 sq m of employment floorspace
2. A minimum of 250 dwellings, including at least 100 affordable homes to meet local needs (See Core Strategy Policy CS9);
3. Approximately 0.24 ha of public open space within the development with the potential to be used as formal outdoor provision for the Rainbow Leisure Centre;
4. The retention of community facilities and existing on-site formal open space provision for youth groups to be incorporated within the redevelopment of the Linton’s Lane Centre site;
5. New access arrangements onto the site from East Street and Hook Road as approved by the Highway Authority;
6. Traffic calming and management measures within the development site and locality as approved by the Highway Authority;
7. Integrated footpath and cycleway networks that provide connections to existing networks on East Street and Hook Road, with a shared route providing a link between Hook Road and Stones Road;
8. The retention of important existing trees, provision of additional tree planting and landscaping, involving the planting of native species;
9. Appropriate mitigation measures to counter any adverse on-site impacts caused by contamination from previous uses;
10. Adequate mitigation measures to create noise and visual barrier between the residential components of the site and the adjoining railway line;
11. Surface water flood risk mitigation measures that meet the requirements of the Council’s Surface Water Management Plan and the Environment Agency;

5.17 The allocation site is primarily controlled by a number of utilities landowners, including the National Grid, Scotia Gas and Thames Water. There are a variety of uses spread across the site, including gas, electric and water utilities, open storage, a community youth centre, partially vacant buildings, open space, and retail and office space. The comprehensive redevelopment of the site will contribute towards the regeneration of this part of East Street. It will also help meet Borough-wide housing and employment floorspace targets.

5.18 It is proposed to allocate a site with a gross area of about 2.5 ha for a mix of uses, comprising new employment floorspace, about 250 dwellings and 0.24 ha of public open space provision. This strategic site is defined on Map 13.

5.19 Currently part of the site is occupied by gas holders, which are ‘notifiable installations’. Although it is envisaged that these will be removed or relocated to an alternative site as part of the redevelopment, it may be that development is phased and parts of the site will come forward prior to the notifiable installations being removed. This may have implications for the type of development that can take place in proximity to the gas holders. This issue will be explored with
landowners, site occupiers and the Health and Safety Executive through the production of the development brief.

5.20 The site will deliver new employment floorspace on those parts of the site with frontage access onto East Street and Hook Road. These are appropriate locations for high density employment uses, such as modern serviced office developments, which will contribute towards the vision for this part of the Town Centre.

5.21 The regeneration of the site will provide about 0.24 ha of new formal public open space provision. This could take the form of flood-lit public all weather multi-use pitch provision to be operated by the adjoining Rainbow Leisure Centre. The retention of existing formal open space provision to the rear of the Linton’s Lane Centre will also be sought.

5.22 Located in the north eastern corner of the site, the Linton’s Lane Centre provides a valued community facility, serving a wide variety of youth interest groups. The Council will work in partnership with Surrey County Council and the landowner to ensure that community uses are retained on site, either in their current form, or as part of a comprehensive redevelopment of the wider site.

5.23 The site will be accessed by provision of new highway access points to both East Street and Hook Road. Where possible these will make use of existing highway infrastructure in order to minimise disruption to the Town Centre’s highway networks.

5.24 Within the development, traffic management and calming measures will need to be provided to standards required by the highway authority. Improvements to the footpath and cycle route network will increase access across the site. In particular, the existing route linking Hook Road with the Rainbow Centre will be extended across the Linton’s Centre Site through to Stones Road in order to provide a direct pedestrian and cycle route between the adjoining residential and employment areas and the Town Centre.

5.25 The comprehensive redevelopment of this site provides an opportunity to introduce significant biodiversity improvements to this part of the Town Centre. This will make a valuable contribution towards the enhancement of the Town Centre’s character and appearance in addition to meeting the Council’s wider Biodiversity Action Plan objectives. Retaining existing trees and planting, in conjunction with new planting across the site will meet part of this objective. Innovative measures such as the incorporation of green roofs or walls, and wildlife nesting boxes within the design of new buildings would also enhance biodiversity.

5.26 On-site contamination, from the previous industrial and utility uses, is an issue for the redevelopment of this site and may impact upon the ability to deliver all of the specified development objectives. Landowners and developers are advised to take this into full account when assessing the value of the site. The developers of this site will conduct a full of assessment of the level of contamination as part of the planning application process. The developers will work with the Council, and other relevant parties such as the Environment Agency, from an early stage to agree appropriate mitigation measures. Developers will also work with the Council to ensure that the noise and vibration
impacts of the adjoining railway line upon future on-site residential uses are mitigated to an appropriate level.

5.27 The Town Centre has a higher level of surface water flood risk. This area of higher flood risk is identified within the Epsom & Ewell SFRA and will be the subject of a Surface Water management Plan. Developers will work with the Council and the Environment Agency from an early stage to agree surface water disposal requirements and mitigate any negative impacts upon flood risk associated with the redevelopment of the site. Developers are advised to contact Thames Water at an early stage to resolve foul drainage problems.

5.28 The Town Centre is the most densely developed part of the Borough, containing a wide variety of different uses that have a constant heat and energy need. In order to meet these needs and at the same time realise longer term carbon reduction targets opportunities for decentralised energy production and combined heat and power will be pursued. The size of the Utilities Site allocation, the mix of uses proposed and the high energy and heating demands of neighbouring uses, particularly the Rainbow Leisure Centre and adjoining office uses, suggest that this objective can be met.

5.29 The redevelopment of this strategic site also provides an opportunity to deliver exemplar energy efficient buildings that have carbon reduction measures fully integrated into their design and construction. The future Delivery DPD will set appropriate and viable targets for carbon reduction through design, taking account of the Code for Sustainable Homes, Building for Life and BREEAM standards. These targets will be linked to the Council’s Climate Change Strategy. Developers are advised to factor in the cost of these essential measures when purchasing sites for redevelopment.

5.30 A development brief will be prepared for this area in conjunction with partners, including the County Council and developers. It will include detailed advice on the distribution, phasing, design and density of future developments, and accessibility, public realm, biodiversity, mitigation of on-site contamination, surface water disposal, flood risk and landscaping.
Epsom Station site

Policy E16

Proposals for the redevelopment of Epsom Station, as defined on the Town Centre Proposals Map, will require delivery of the following:

1. An improved railway station principally comprised of a new entrance, ticketing office and concourse;
2. A public transport interchange, facing the Station with access onto Station Approach. This will comprise a new bus stop and shelter, a taxi rank and a passenger dropping-off point;
3. A minimum of 100 dwellings, including at least 40 affordable homes to meet local needs (see Core Strategy Policy CS9);
4. A minimum of 1,500 sq m of commercial floorspace, with the potential to be developed for the following uses – office space, hotel accommodation or commercial healthcare uses;
5. A maximum of 1,000 sq m of ground floor retail provision, which could include a café or restaurant;
6. The establishment of a residents car club, which will form a component of the wider on-site travel plan;
7. A minimum of 250 secure cycle parking spaces located within the Station building and along the external concourse for use by customers;
8. Traffic calming and management measures within the development site and locality as approved by the Highway Authority;
9. Integrated footpath and cycleway networks that provide connections to existing networks on Station Approach and Waterloo Road;
10. Improvements to existing pedestrian footpaths linking the Station and the Old Town, Market Place and Hook Road car park. These improvements will include enhanced signage, use of unified paving materials and lighting;
11. Adequate mitigation measures to create a noise and vibration barrier between the residential components of the site and the adjoining railway line;
12. The retention of important existing trees, provision of additional tree planting and landscaping, involving the planting of native species;

5.31 Epsom Station is controlled by Network Rail and serves as an important public transport gateway into the Town Centre. Whilst Epsom Station is the second busiest in the county, its buildings are aging and in need of major refurbishment.

5.32 It is proposed to allocate a site with a gross area of about 0.35 ha for a mix of uses, comprising a new station building and concourse, facilities for public transport interchange, about 100 residential units, a maximum of 1,000 sq m of retail floorspace and at least 1,500 sq m of commercial floorspace. This strategic site is defined on Map 14.

5.33 The comprehensive redevelopment of the site will deliver an improved public transport gateway and interchange for the Town Centre, which will meet public transport passenger needs during the Plan E period. The redevelopment will provide passengers with improved station facilities, including new ticketing
facilities, a fully covered entrance and foyer area and concourse. Facing the station will be an improved interchange between rail and other public transport modes; comprised of a new bus stop and shelter with sufficient capacity to meet planned-for passenger growth. The redeveloped interchange will incorporate improved taxi rank facilities.

5.34 The redevelopment of the site will be facilitated through enabling developments comprised of new residential and commercial uses, which will contribute to the diversity of uses already present within this part of the Town Centre. New retail uses, potentially including a small café or restaurant will support the overall amenity for travellers, residents and workers.

5.35 The redevelopment of the station will deliver an appropriate level of on-site parking provision for rail passengers, residents, and employees. The level of parking provision will be directly linked to the site’s travel plan and the Town Centre Parking Strategy. The parking management and charging regime for the site will provide sufficient parking to meet the needs of the on-site uses and their users, encourage sustainable travel patterns and seek to reduce the levels of commuter parking displaced to neighbouring residential areas.

5.36 On-site cycle parking provision is a distinctive element of Epsom Station, being of value to local commuters. Consequently it is vital that the improvements to the transport interchange provide sufficient secure cycle parking for passengers for the Plan E period. Improved provision will be located within the new station building and along the concourse area facing the station. The design of new cycle parking provision will conform to the street furniture standard being developed for the entire Town Centre.

5.37 Within the development the provision of traffic management and calming measures will need to be provided to standards required by the Highway Authority. Improvements to the footpath and cycle route network will increase access between the site, the Town Centre and the residential areas to the north. In particular, public realm, signage and lighting improvements will be made to the existing routes linking Station Approach, the Market Place and along the pedestrian and cycleway at the rear of the Ebbisham Centre, which links the Station to Hook Road car park.

5.38 Developers will also work with the Council to ensure that the noise and vibration impacts of the adjoining railway line upon future on-site residential uses are mitigated to an appropriate level. The developer will ensure that these measures are fully incorporated into the buildings design from the outset. These measures will not compromise the integrity of the final scheme.

5.39 The Town Centre is the most densely developed part of the Borough, containing a wide variety of different uses that have a constant heat and energy need. In order to meet these needs and at the same time realise longer term carbon reduction targets opportunities for decentralised energy production and combined heat and power will be pursued. The energy demands and the mix of uses proposed for the Station site, and the potential to help meet the energy and heating needs of adjoining residential uses, suggest that this objective can be met.

5.40 The redevelopment of this strategic site also provides an opportunity to deliver an exemplar energy efficient building that has carbon reduction measures fully integrated into its design and construction. The future Delivery DPD will set
appropriate and viable targets for carbon reduction through design, taking account of the Code for Sustainable Homes, Building for Life and BREEAM standards. These targets will be linked to the Council’s Climate Change Strategy. Developers are advised to factor in the cost of these essential measures when purchasing sites for redevelopment.
Other opportunity sites

5.41 In addition to the key strategic opportunity sites already identified by Plan E, the following sites are allocated for redevelopment. The delivery of these sites will contribute towards meeting Plan E’s wider objectives. These sites are defined on Map 15.

Policy E17

Proposals for the redevelopment of the following areas, as defined on the Town Centre Proposals Map, to a mix of uses specified under each site as set out in the following sections, will be permitted.

This is provided that future development proposals demonstrate that their scale, massing, layout and design will positively enhance Epsom Town Centre’s distinctive character and appearance, with particular regard to heritage conservation, the townscape and roofscape and biodiversity enhancement. Proposals will deliver enhancements to accessibility, including servicing arrangements, and to the public realm.

a. Market Place, High Street
b. Former Woolworth’s Store, High Street
c. Pickard House, Upper High Street
d. Former Magistrates and County Court site, The Parade/ Ashley Road
e. Global House, Ashley Avenue
f. TK Maxx Store, High Street
g. Emergency Service Uses, Church Street
h. Comrades Club, The Parade
i. Land to rear of The Albion Public House, South Street
j. Town Hall Square and car park, rear of Town Hall

Developers will resolve any issues related to contaminated land, surface water flood risk and service utilities.
The Market Place is located within the heart of the Epsom's main shopping area and makes an important contribution to the town. It forms part of the area covered by the vision for the Old Town Centre and Market Place. The site is opposite to primary retail frontages along High Street (west) immediately outside of the Ashley Shopping Centre. This is a very prominent area, which includes a one-way system that brings north bound through-traffic into the Town Centre.

The site is comprised of a large paved pedestrian area, which serves as a venue for regular street markets and public events. It also includes the Clock Tower, which is a very distinctive landmark. There is also planting that serves as a barrier between the pedestrianised part of the Market Place and the one-way system.

**Issues**

The current volume of vehicular traffic and associated congestion has a negative impact upon the historic and shopping environment. The areas
continued status as designated highway land acts as a significant constraint to delivering enhancements to the on-site pavement culture uses, the public realm and biodiversity.

**Opportunities**

5.45 There is a very good opportunity to increase the number and frequency of pavement culture uses across the site. Along with associated public realm and biodiversity improvements this will make a significant contribution towards securing the Town Centre's long term economic vitality and viability. To achieve this objective the Council will work with the Highway Authority and other key partners involved in the management of the town centre to remove the highway designation. There is a risk that this constraint may prove difficult to resolve during the life of the plan. Consequently, the Council will continue to explore other mechanisms that will allow the use of the Market Place for higher intensity pavement culture uses within the confines of the highway status. This could include introducing more temporary or seasonal uses, and a greater use of the area for promotional events. Such contingencies will ensure greater use of the area and generate support for further intensification in the longer term.

5.46 Monitoring the delivery of these improvements will initially concentrate upon the Council’s and highway authority’s progress in de-designating the Market Place’s highway status. Increases in footfall through this part of the town centre should serve as a measure of increased vitality and viability and will be monitored through the regular assessment of town centre health. Other indicators will include the number of new pavement culture uses introduced into the area and possibly the frequency and quality of markets and events. The practical arrangements for monitoring the delivery of this site could be shared between the Council and its LSP partners.

### Development of this site will deliver:
- An exciting pedestrian environment where street markets, cafes and cultural events will flourish and contribute to the health of the wider Town Centre
- Public realm and biodiversity improvements that enhance the historic shopping environment

### Key requirements for redevelopment:
- De-designation of highway status on the Market Place
- Maintaining and enhancing the historic character and appearance of the Market Place
- Retention and expansion of pavement culture uses – including the potential for permanent, or semi-permanent street markets, storage for market uses, pavement cafes and restaurants, open air cultural events and public seating and amenity space
- Biodiversity improvements that reflect the Borough-wide Biodiversity Action Plan and integrate with other similar improvements across the Town Centre.

34 The highway status of the Market Place restricts the nature of the uses permissible across the site.
5.47 This is a former department store with retail uses spread across the basement, ground floor and first floor with the remainder of the building being used for storage and ancillary purposes. It is in a prominent location within the High Street (east) primary retail frontage and has rear service access onto Derby Square. The former department store forms part of a historic 1930s shopping parade that is included within the Town Centre Conservation Area. The site falls within the vision for the High Street (east).

**Issues**

5.48 The site serves as an important retail anchor at the heart of this part of High Street. Consequently, retaining a strong retail presence on more than one floor is essential to ensure that there is sufficient retail attraction to draw people across the Town Centre through this part of the High Street. Current service and delivery practises result in good vehicles parking along the High Street (east), which narrows the carriageway and results in congestion across the Town Centre.

**Opportunities**
5.49 This is one of small number of existing shops within the Town Centre with a large shop floorspace area. As such, it provides an opportunity for a new department or bulky goods store. The refurbishment of the existing store could also deliver a secondary access into the store from Derby Square. This would produce a more active frontage with the Square in addition to providing an improvement to the character and appearance.

5.50 By retaining a significant retail attraction within this primary retail frontage location there will be further opportunities to raise the retail offer available through other shops along this shopping parade, as they become available. The sympathetic conversion of any residual upper floorspace for office or residential floorspace provides an opportunity to further increase the diversity of uses within this part of the Town Centre.

Development of this site will deliver:
- A large scale shopping destination that will attract shoppers to High Street (east) from the Old Town/ Market Place and Upper High Street
- Improvements to the character and appearance and the building and the wider area, especially in terms of the building’s relationship with Derby Square.

Key requirements for redevelopment:
- Retention and enhancement of the existing historic building
- Retention of at least 900 sq m of comparison retail floorspace (the equivalent of retaining at least two floors)
- Improvements to rear service area to ensure effective off-street delivery of retail goods
- Explore the viability of opening a secondary access into the shop from Derby Square
- Provide an opportunity for surplus residual upper floorspace to be sympathetically converted for either office or residential use, which will be secondary to the dominant retail uses across the rest of the site.
5.51 This is a modern office building that is located on the edge of the Town Centre on the far eastern edge of the Upper High Street. The site falls within the area covered by the vision for Upper High Street/Upper Town. The building forms part of an important gateway into the Town, clearly marking the transition between commercial uses and the adjoining domestic-scale residential development.

Issues

5.52 Vacant commercial buildings have a negative impact upon the shopping environment in Upper High Street. Returning this site to full or partial commercial use will have a positive impact. Refurbishment of the building or a more comprehensive redevelopment incorporating adjoining buildings will also have a positive impact upon the Upper High Street’s historic character and appearance and the wider Town Centre Conservation Area.

Opportunities

5.53 The site could come forward as part of a wider redevelopment, incorporating adjacent buildings, including the locally listed former Epsom Railway Station and/or the neighbouring garage block. This could provide an opportunity for a mixed-use scheme with retail and other appropriate town centre uses along the Upper High Street frontage and residential uses along the upper floors.
Development of this site will deliver:

- Commercial uses that will positively contribute towards the health of Upper High Street
- Improvements to the character and appearance and the building and the wider area, particularly in terms of optimising the potential of the adjoining former Epsom Railway Station.

Key requirements for redevelopment:

- Restore ground floor level to commercial use. This site is considered appropriate for small-scale retail and/or professional service uses
- Provision for office/ business or residential uses to the upper floors
- Encourage proposals that also deliver the comprehensive redevelopment of the adjoining single storey shopping parade and the sympathetic conversion of the historic locally listed former railway station
- Takeaways and fastfood premises are not considered appropriate ground floor uses at this location.

17d. Former Magistrates and County Court site, The Parade/ Ashley Road

5.54 This site is comprised of a number of buildings that were formerly used by the Magistrates and County Court. This town centre site is located to the immediate south of the area covered by the vision for the High Street (east). The site has frontages onto The Parade and Ashley Road.
**Issues**
5.55 Once redeveloped, this site will form part of the predominantly residential area located between Ashley Road, The Parade, Heathcote Road and Worple Road. The character and appearance of this part of the Town Centre is to a smaller domestic scale, building heights will be an important consideration. There is limited on-street parking availability across this part of the Town Centre and any development proposals will need to address this issue. The site falls within an area identified as being of higher risk to surface water flooding.

**Opportunities**
5.56 This is an appropriate location for a mixed-use development scheme, comprised of business or healthcare uses on the ground floor and higher density residential uses on the upper floors. The potential ground floor business or healthcare uses will complement existing civic and commercial office uses located along The Parade and Ashley Road.

**Development of this site will deliver:**
- Comprehensive redevelopment of the vacant Epsom Magistrates and County Court.

**Key requirements for redevelopment:**
- Provision for commercial office or healthcare uses on the ground floor and residential uses on the upper floors
- Residential uses to deliver up to 60 units, including at least 24 affordable homes
- Retail, restaurant, takeaway and fastfood premises are not considered appropriate ground floor uses at this location
- On-site parking provision for future residents, employees and visitors will be calculated to a maximum standard and appropriately adjusted to take account of the high levels of accessibility to alternative transport modes
- The provision of a Green Travel Plan that will ensure residents, employees and visitors make sustainable travel choices
- Potential surface water flood risk to the site will be fully assessed and mitigated.

**17e. Global House, Ashley Avenue**
5.57 This is an existing, partially occupied commercial office building that forms the southern extent of the Ashley Shopping Centre complex. The building forms part of the important employment area focused upon Ashley Avenue, which is covered by the vision for the Ashley Centre and Ashley Avenue. The site fronts onto Ashley Avenue and shares access and off-street parking provision with the adjoining Ashley Centre.

**Issues**
5.58 Evidence suggests that the Borough has insufficient employment floorspace, especially modern serviced office accommodation, to meet future population growth and reduce the reliance upon job opportunities beyond the Borough's
boundary. Consequently, the retention, enhancement and intensification of existing provision, particularly at highly accessible locations such as this is a key objective for the local development framework.

Opportunities

5.59 This is a highly accessible location for commercial office provision, which is well related to other adjoining town centre commercial uses. The retention of commercial uses at this site will help ensure a healthy town centre environment. The Council will work closely with the owners of the building to ensure that it remains in commercial use. In order to take account of potential changes to the employment market, the Council will consider appropriate alternative commercial uses that are compatible with the wider Town Centre location.

Development of this site will deliver:
- An employment opportunity that helps meet local employment needs and reduces commuting beyond the Borough boundary for work.

Key requirements for redevelopment:
- Retain and enhance the existing building to optimise its contribution to the Borough’s stock of modern office provision
- Provide contingency that would allow for other appropriate alternative commercial uses
- Residential uses are not considered appropriate on this site.
- A Green Travel Plan that will ensure future users of the building make sustainable travel choices.
17f. TK Maxx Store, High Street

5.60 This is a prominent site located within the heart of the Town Centre’s main shopping area along the western end of the High Street. The area falls within the vision for the Old Town and Market Place. The on-site retail use forms part of the identified primary retail frontage within this part of the High Street and there is also a commercial leisure use within parts of the sites upper floors. There is an underused alleyway parallel to the site that provides a pedestrian access route between the Old Town and Epsom Railway Station.

Issues
5.61 The Epsom Town Centre Conservation Area Appraisal identifies the buildings within this site as having a neutral impact upon the surrounding Old Town and Market Place area. The Appraisal states that the existing buildings could be replaced by better designed buildings in the future.

Opportunities
5.62 The comprehensive redevelopment of this site provides an opportunity to improve the character, appearance and setting of this part of the Town Centre. The site also provides a good opportunity for further intensification, potentially through the introduction of a mix of uses. Redevelopment also provides an opportunity to strengthen the active primary retail frontage. Improvements to the adjoining pedestrian footway, linking through to the Railway Station, will have wider accessibility benefits for the Town Centre.
Development of this site will deliver:
- A mixed use development of high quality design that enhances the character and appearance of the Old Town and Market Place
- Improved pedestrian access between the Old Town and Market Place area and the Railway Station.

Key requirements for redevelopment:
- Proposals will be of high quality design, reflecting the results of the Conservation Area Appraisal and its associated management plan
- Enhanced ground floor retail provision with an active retail frontage, in keeping with this prominent high street location
- Residential uses to deliver up to 65 units, including at least 26 affordable homes
- Retain rear access and servicing arrangements for the on-site retail uses
- Improvements to the public realm, signage and lighting of the adjoining pedestrian footway to provide a clear and safe pedestrian route through to the Railway Station.

17g. Emergency Service Uses, Church Street

5.63 This is a large site located on the Town Centre’s south eastern edge. It is currently occupied by the police force, ambulance service and the local primary care trust. Church Street is an important gateway into the Town Centre from the south. This part of Church Street is characterised by large detached buildings that have predominantly been in civic or community use.

Issues

5.64 A county-wide review of community infrastructure provision states that the current occupiers are not making optimal use of the site and are considering options to relocate, co-locate or consolidate elsewhere within the Borough.
Opportunities

5.65 The release of this site provides an opportunity to redevelop the site for a mix of uses, comprised primarily of residential uses but possibly incorporating the retention of some of the current community services in a reduced capacity. The redevelopment of this site could also facilitate the relocation of the on-site uses to alternative locations and/or their co-location with other community services. This will deliver improvements to the service in terms of performance and efficiency.

Development of this site will deliver:

- Improvements to the provision of the existing on-site community services through their relocation, co-location or consolidation
- A primarily residential mixed use development scheme that has the capacity to retain a community use within part of the site.

Key requirements for redevelopment:

- Residential uses to deliver up to 50 units, including at least 20 affordable homes
- The design of future proposals will maintain and enhance the character and appearance of Church Street and the setting of the adjoining conservation area
- New building(s) will serve as an exemplar of energy efficiency that has carbon reduction measures fully integrated into its design and construction
- On-site parking provision for future residents, employees and visitors will be calculated to a maximum standard and appropriately adjusted to take account of the high levels of accessibility to alternative transport modes
- The provision of a Green Travel Plan that will ensure residents, employees and visitors make sustainable travel choices.
5.66 This site is currently in use as a private members club and is located just outside of the defined Primary Shopping Area, within short walking distance of the Spread Eagle Junction. The site is located to the immediate south of the area covered by the vision for the High Street (east). The site has frontage onto The Parade.

Issues
5.67 The site presently has a low intensity of use. The development industry has shown active interest in the comprehensive redevelopment of the site for new commercial uses. The character and appearance of this part of the Town Centre is to a smaller domestic scale, building heights will be an important consideration. There is limited on-street parking availability across this part of the Town Centre and any development proposals will need to address this issue. Current service and delivery arrangements are poor. The site falls within an area identified as being of higher risk of surface water flooding.
Opportunities
5.68 There is an opportunity to use this highly accessible site more intensively for the wider economic benefit of the Town Centre. Lying outside of the Town Centre Primary Shopping Area the site has the potential to be redeveloped for a variety of commercial uses. Redevelopment also provides an opportunity to provide new accommodation for the on-site club use. The Council will work with future developers to examine opportunities to meet the sites parking needs by optimising the use of existing public parking provision.

Development of this site will deliver:
• Comprehensive redevelopment for commercial uses that contribute towards the vitality and viability of the wider Town Centre.

Key requirements for redevelopment:
• Provision for commercial hotel, office, leisure and healthcare uses.
• Retention of the Comrades Club use, comprising of a gross internal floor area of 329 sq m
• On-site parking provision for future occupiers and visitors will be calculated to a maximum standard and appropriately adjusted to take account of the high levels of accessibility to alternative transport modes
• The provision of a Green Travel Plan that will ensure the users of the site make sustainable travel choices
• Ensure the provision of effective rear service access through Capital Square
• Potential surface water flood risk to the site will be fully assessed and mitigated.

17i. Land to rear of The Albion Public House, South Street
5.69 This backland site is comprised of a motor vehicle repair garage, an area of open storage used by the garage and private car parking provision. This site is within the vision area for the Old Town and Market Place. This historic part of the Town Centre was formerly one source of the ‘Epsom Salts’ with which the town is famously associated. The area lies within the Town Centre Conservation Area. There are a number of historic buildings and structures that adjoin the site, some of which are listed.

Issues
5.70 This part of the Town Centre has a very distinctive character and appearance, which reflects its historic importance. Design is a particularly important issue and the impact upon adjoining listed buildings and structures will need careful consideration. The existing employment uses positively contribute to the overall mix of uses present within the Town Centre. Ideally, the redevelopment of the site should either incorporate these existing uses or introduce new commercial uses. Whilst the site is highly accessible to public and other alternative transport modes, vehicular access onto the site is poor.
Opportunities

5.71 The site provides a development opportunity for higher intensity uses that will contribute to the diversity of the Town Centre. The Town’s former status as a spa town does not currently feature as part of its brand image. The redevelopment of this site, with its historic associations to the spa tradition, provides an opportunity to capitalise upon that heritage.

Development of this site will deliver:
- A higher density mixed use development that enhances the character and appearance of the Old Town and Market Place.

Key requirements for redevelopment:
- Residential uses to deliver up to 8 units, including at least 2 affordable homes
- Commercial uses to deliver up to 500 sqm of employment floorspace
- On-site parking provision for future occupiers and visitors will be calculated to a maximum standard and appropriately adjusted to take account of the high levels of accessibility to alternative transport modes
- The provision of a Green Travel Plan that will ensure the users of the site make sustainable travel choices.
5.72 This Council owned site serves as a short stay car park within the heart of the High Street (east) vision area. The site is bounded by retail and commercial uses that front onto the High Street, residential uses along Church Road and the Town Hall that fronts onto The Parade. The car park is a valuable resource for those visiting these different town centre uses. A heavily trafficked alleyway provides a direct link through to the High Street. There are also pedestrian routes through to The Parade and Church Street.

5.73 The Epsom Town Centre Retail Study identified the public’s negative perceptions of car parking provision around the Town Centre as a constraint to regeneration. The lack of effective rear service access for shops along the southern half of High Street (east) also presents an issue for this site.

5.74 This area offers the opportunity to create a valuable public space, away from the busy traffic of the High Street that can be used to accommodate occasional events in addition to its primary purpose as short-stay parking. The area may also provide an opportunity for achieving rear servicing to the shops along High Street.

Development of this site will deliver:

- A flexible public space that can accommodate occasional events but primarily serves as high quality short stay parking provision and rear
service access that serve adjoining retail, business, leisure, civic and residential uses.

Key requirements for redevelopment:
- The scale of parking and its associated management regime will be in accordance with the Town Centre Parking Strategy
- Ensure the provision of effective rear service access for adjoining retail, commercial and residential uses
- Surface materials, signage and street furniture to be consistent with the agreed palette for the Town Centre
- Potential surface water flood risk to the site will be fully assessed and mitigated.
Appendix 1

Glossary

Accessibility The ability of people to move round an area and to reach places and facilities, including pensioners and disabled people, those with young children and those encumbered with luggage or shopping.

Active Frontage Making frontages ‘active’ adds interest, life and vitality to the public realm. Active frontage should consist of the following:
• Frequent doors and windows, with few blank walls
• Articulated facades with bays and porches
• Lively internal uses visible from the outside, or spilling onto the street
• Activity node concentration of activity at a particular point.

Air Quality Management Area (AQMA) If a local authority finds any places where the air quality objectives are not likely to be achieved, it must declare an Air Quality Management Area. This area could be just one or two streets, or it could be much bigger. Following this the local authority will put together a plan to improve the air quality - a Local Air Quality Action Plan.

Annual Monitoring Report (AMR) An annual report for the previous financial year which updates progress on producing the Local Development Framework and assesses the performance of Local Development Framework policies.

Area Action Plan (AAP) A Development Plan Document that establishes a planning framework for areas of change or conservation.

Affordable Housing Housing for people whose incomes are insufficient to allow them to afford decent local housing on the open market.

Biodiversity The variety of all life forms (animals, plants and living things), the genes they contain and the ecosystems they form part of.

Biodiversity Action Plan (BAP) A local-level BAP identifies where action needs to be taken to implement national targets for habitats and species, and can also identify appropriate delivery mechanisms.

BREEAM Building Research Establishment Assessment Method. Measures the
environmental performance of commercial buildings by assessing water, waste, energy and travel usage.

**Building For Life**
National standard for well-designed homes and neighbourhoods led by CABE and the Home Builders Federation. There are 20 Building For Life criteria that are used to evaluate the quality of schemes at pre-planning and post-construction phases.

**Business Improvement District (BID)**
A BID is a partnership between the local authority and the local business community to develop projects and services that will benefit the trading environment within the boundary of a clearly defined commercial area. Projects may include extra security, improved events, cleansing and environmental measures and improved promotion of the area. Businesses within the defined area pay an additional tax and vote to decide how the funds will be spent.

**CHP or Combined Heat and Power**
A plant that is designed to produce both heat and electricity from a single heat source.

**Code for Sustainable Homes**
Or CfSH: Code for Sustainable Homes is a new national standard to guide the design and construction of sustainable homes. The Code gives a sustainability rating to development which ranges from 1(*) to 6(******). The higher the rating the more sustainable a home is. The assessment includes efficiency in energy, water, waste, materials, ecology and surface water run-off.

**Comparison goods**
Goods that consumers buy at infrequent intervals and would normally compare prices before buying such as household appliances, furniture, clothing and footwear.

**Convenience Goods**
Goods which are commonly purchased everyday. They include food, drink, tobacco and newspapers.

**Conservation Area**
A designated area of special architectural and/or historical interest, the character or appearance of which it is desirable to preserve or enhance. It is a recognition of the value of a group of buildings and their surroundings and the need to protect not just individual buildings but the character of the area as a whole.

**Core Strategy**
A Development Plan Document that sets out a long term spatial vision and spatial objectives and core policies to deliver the
Density
The floor space of a building or buildings or some other unit measure in relation to a given area of land. Built density can be expressed in terms of plot ratio (for commercial development); number of units or habitable rooms per hectare (for residential development); site coverage plus the number of floors or a maximum building height; or a combination of these.

Development Briefs
Development briefs provide detailed design advice for important development sites. These can supplement higher level plans such as Area Action Plans. These allow local communities to participate in detailed design development and enable local authorities to deliver the vision for a site with a greater degree of certainty of what will be achieved.

Development Plan Document (DPD)
A collective term for the core planning documents contained within the Local Development Framework – including the core strategy, site specific allocations of land and area action plans (such as Plan E).

Gateway
A structure, building or group of buildings that defines an entrance/exit to an area.

Green Corridors
Linear wildlife and public access corridors that link areas of green infrastructure and green spaces with each other and to settlements, and which also link into the wider countryside.

Green Infrastructure
Sports grounds, cemeteries, school grounds, allotments, commons and historic parks and gardens) woodlands (including Ancient Woodlands) and green-way links. It offers opportunities to provide for a number of functions, including recreation and wildlife as well as landscape enhancement.

Green Roofs
Green roofs comprise a multi-layered system that covers the roof of a building with vegetation cover/landscaping over a drainage layer. They are designed to retain rain and reduce the volume of surface run off. Green roofs can be anything from a thin growing layer such as mosses to plants, shrubs and water features.

Green Spaces
Publicly accessible spaces, including local parks, sports grounds, cemeteries, school grounds, allotments, commons
Green Travel Plans
These are normally developed in partnership with employers, business and in certain circumstances residents to reduce commuting by car and encourage more sustainable car usage and travel patterns.

Ground Source Heat Pump
A form of renewable energy generated from natural heat-energy found underground.

Infrastructure
A collective term for services such as roads, electricity, sewerage, water, education and health facilities.

Landmark
A building or structure that stands out from its background by virtue of height, size or some other aspect of design.

Local Development Documents (LDD)

Local Development Framework (LDF)
The LDF comprises Development Plan Documents, Supplementary Planning Documents, a Statement of Community Involvement and Annual Monitoring Report.

Local Development Scheme (LDS)
Sets out the Council's programme for preparing and reviewing Local Development Documents.

Local Strategic Partnerships
A Local Strategic Partnership (LSP) is a non-statutory body that brings together the different parts of the public, private, voluntary and community sectors, to work at a local level. The lead role in the LSP is taken by the local council. Other major players could include the local police and the primary care trust. The LSP helps different organisations work together to improve the quality of life in an area and deliver public services more effectively.

Market Town
A town which has an open space where a regular market is held; historically within rural areas.

Mitigation Measures
These are measures requested/ carried out in order to limit the damage by a particular development/ activity.

Mixed Use Development
Development containing a variety of activities and uses on single sites or across wider areas such as town centres.

National Planning Guidance
Sets out the Government's national policies and principles on planning which local planning policy must be consistent with. These take the form of Planning
Notifiable Installations
 Certain types of utility infrastructure uses, such as gas storage facilities, are designated as notifiable installations by the Health and Safety Executive. These uses are subject to planning controls aimed at keeping them separated from housing and other incompatible land uses.

Previously Developed Land
 In the sequential approach this is preferable to greenfield land. Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition includes the curtilage of the development. Previously developed land may occur in both built-up and rural settings. A precise definition is included in Planning Policy Statement 3 ‘Housing’.

Proposals Map
 A map that shows the boundaries of all policy areas as set out in Development Plan Documents.

Public Art
 Permanent or temporary works of art visible to the general public, whether part of a building or freestanding; can include sculpture, lighting effects street furniture, paving railings and signs.

Public Open Space
 Public open space includes parks, playing fields, outdoor sports facilities and allotments with public access.

Public Realm
 The space between and within buildings that are publicly accessible.

Regional Spatial Strategy (RSS)
 Plan covering the East of England as a whole, and setting out strategic policies and proposals for managing land-use change.

Renewable Energy
 This includes energy sources that use natural resources such as sunlight, wind, rain, tides and geothermal heat, which are naturally replenished. Renewable energy technologies range from solar power, wind power, hydroelectricity/micro hydro, biomass and biofuels for transportation.

Section 106 agreements
 Legally binding agreements between a local planning authority and land developers to secure planning objectives for the area and for the community. Agreements can be used for a variety of uses such as the requirement for the developer to provide affordable housing or undertake environmental
improvements to a town centre.

Site of Special Scientific Interest (SSSI)
An area identified as having flora, fauna, or geological features of special national interest.

Site Specific Allocations
A document which sets out sites for specific uses and development such as housing, jobs and community facilities which are necessary to deliver the Core Strategy of the LDF.

Stakeholders
Any person, group, or organisation affected by or having an interest in the development of planning policy.

Statement of Community Involvement
A document that sets out how a local planning authority intend to involve communities and stakeholders in the process of preparing local development documents and development control decisions.

Strategic Flood Risk Assessment (SFRA)
A planning document that provides a robust depiction of the levels of flood risk across an area, informing emerging policy making and the development management process.

Supplementary Planning Documents
A document which further expands on information contained in policies in Development Plan Documents. The document may explain through text, illustrations and practical examples, how policies can be taken forward.

Surface Water
Surface water is rainwater that accumulates on land as a result of storms, and can include run off from urban areas such as roads and roofs.

Surface Water Management Plan
Recent government policy development has promoted the production of surface water management plans (SWMPs).

Surface water management plans (SWMPs) will be useful tool for:

- assessing the risk of surface water flooding
- identifying options to manage risk to acceptable level
- making the right investment decisions
- planning the delivery of actions to manage flood risk.

SWMPs will look at existing problems and inform planning decisions for new development.

Sustainability Appraisal
A tool for assessing policies to ensure that they reflect sustainable development objectives, including environmental,
social and economic factors. The Planning and Compulsory Purchase Act 2004, requires local planning authorities to undertake a sustainability appraisal of all local development documents.

**Sustainable Development**
Development that aims to ensure a better quality of life for everyone, now and in the future through the protection of the environment, social progress, the prudent use of natural resources and the maintenance of economic growth.

**Town Centre Hierarchy**
Categorises town centres depending on their function and the area they serve. Town centres may be defined as International, Metropolitan, Major, District and Local.

**Use Class Order**
The Use Classes Order is a town planning tool which categorises everything from shops, services, industrial uses, hotels, dwellings, institutions and leisure uses into several classes. The Use Class Order effectively controls what buildings can be used as and what the use of buildings can be changed to.
Appendix 2

Bibliography

A variety of documents helped to inform the development of Plan E.

The national Planning Policy Statements (PPSs) and the remaining Planning Policy Guidance notes (PPGs) are available from the Department of Communities and Local Government (DCLG) website (www.communities.gov.uk).

Other evidence base documents listed below are available on the Council’s website (www.epsom-ewell.gov.uk). The studies have been produced by the Council unless stated otherwise.

- Strategic Housing Land Availability Assessment (2009)
- Retail Study and Town Centre Health Check (2009) GVA Grimley Ltd
- Epsom Town Centre Survey of Building Heights (2009)
- Environmental Character Study (2008) Atkins
- Strategic Flood Risk Assessment (2008) Jacobs
- Epsom Town Centre Footfall Data (2007) Pedestrian Market Research Services (hard copy only)
- Retail Study (2007) CACI Limited
- Survey of Shopping Centres and Parades within the Borough of Epsom & Ewell (2007)
- Open Spaces Audit (March 2006) PMP
- Surrey Housing Potential Study (2005) Surrey Local Authorities
- Employment Land Review (April 2006)
- Plan E Proposed Town Centre Preliminary (Highway) Option Testing Report (Surrey County Council Highway Authority 2009)

All papers are available on the Council’s web site (www.epsom-ewell.gov.uk) under ‘Local Development Framework’ > ‘Evidence Base’, unless stated otherwise.
## Implementation

The Council will monitor the implementation of Plan E and performance against the plans objectives. This section sets out who the main delivery partners are for the policy and the anticipated timeframe for delivery. Each policy has a series of indicators and, where applicable, targets against which progress will be monitored. Some indicators are LDF Core Output Indicators set by the Department for Local Government and Communities that are already reported on in the Annual Monitoring Report. Unless stated otherwise, the indicators will be reported upon annually.

<table>
<thead>
<tr>
<th>Policy number</th>
<th>Objectives policy will assist in delivering</th>
<th>Policy delivery partners (where applicable)</th>
<th>Indicative timeframe for delivery</th>
<th>Indicators</th>
<th>Targets or specific actions (where applicable)</th>
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<tbody>
<tr>
<td>E1 Town Centre boundary</td>
<td>1</td>
<td>N/A</td>
<td>N/A</td>
<td>Town Centre Health Check (This will provide a comprehensive overview as to how the town centre is performing, drawing on many sources of information)</td>
<td>Health check to be carried out every 5 years. Base date 2009</td>
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<tr>
<td>E2 Housing capacity</td>
<td>1, 5</td>
<td>EEBC, Surrey County Council, developers, Registered Social Landlords</td>
<td>2010 to 2026 Housing will be delivered over the plan period. The delivery timescales for the larger sites are set out against the relevant policies</td>
<td>Net additional housing units delivered within the town centre and number of affordable (Core Output Indicators H2(b) and H5) The Density of dwellings delivered (to monitor the most efficient use of PDL). Number of housing units delivered on key opportunity sites Sources of supply - EG upper floors/ conversion/</td>
<td>To be on track to meet target by 2026 and inline with Core strategy affordable housing policy CS9 Figures to be in line with those identified E14, E15 and E16</td>
</tr>
<tr>
<td>Area</td>
<td>Partners</td>
<td>Period</td>
<td>Objectives</td>
<td>Constraints</td>
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<tr>
<td><strong>E3 Retail capacity</strong></td>
<td>1, 2 EEBC, developers, Local Strategic Partnership (economic sub group)</td>
<td>2010 to 2026</td>
<td>Rank in the retail hierarchy (Experian data, national rankings)</td>
<td>Maintain Epsom’s relative position in the retail hierarchy in relation to other London Fringe Centres</td>
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<td></td>
<td></td>
<td></td>
<td>Amount of completed retail floorspace (<strong>Core Output Indicator BD4</strong>), Other indicators within the Town Centre Health Check, for example turn over and vacancy rates of retail units</td>
<td>To be inline with quantities set out in policy E3</td>
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<tr>
<td><strong>E4 Primary Shopping Area / primary &amp; secondary frontage</strong></td>
<td>1, 2 EEBC, developers</td>
<td>2010 to 2026</td>
<td>Location of completed retail floorspace</td>
<td>Provision to be located in accordance with a sequential approach</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Changes of Use in Primary and Secondary retail frontages</td>
<td>Primary retail frontages – number of A1 units to remain above 66%</td>
<td></td>
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<tr>
<td></td>
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<td>Applications within the Primary Shopping Area that seek to change the use of A1 to A2, A3, A4, A5 use classes and their impact on retail frontage designation</td>
<td>No additional A5 uses within primary or secondary frontages</td>
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<td></td>
<td></td>
<td>Other indicators within the Town Centre Health Check</td>
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<tr>
<td><strong>E5 Employment floorspace provision</strong></td>
<td>1, 4 EEBC, developers, Local Strategic Partnership</td>
<td>2010 to 2026</td>
<td>Amount of employment floorspace (<strong>BD1</strong>), Location of losses and gains of employment floorspace</td>
<td>No net loss in employment floorspace</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Core Output Indicator BD1</strong></td>
<td>An overall increase in the town centre of up to 6,000-7,000 sq m</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Other indicators within the Town Centre Health Check</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>E6 Leisure, cultural &amp;</strong></td>
<td>1, 3 EEBC, developers,</td>
<td>2010 to 2026</td>
<td>Losses, gains and co-location of private and public leisure, cultural and community facilities</td>
<td>No net loss in provision. Increase in provision desirable particularly in</td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>Community facilities provision</td>
<td>Local Strategic Partnership</td>
<td>provision</td>
<td>Other indicators within the Town Centre Health Check</td>
<td>South Street and Derby / Oaks Square</td>
<td></td>
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</tr>
<tr>
<td><strong>E7 Building heights</strong></td>
<td>17, 19 EEBC, developers</td>
<td>2010 to 2026</td>
<td>Height and location of new buildings in the Town Centre</td>
<td>To be within the maximum height standards set out in Policy E7</td>
<td></td>
</tr>
<tr>
<td><strong>E8 Energy generation</strong></td>
<td>6 EEBC, Surrey County Council, developers, Energy Saving Trust</td>
<td>2010 to 2026</td>
<td>Production of a Climate Change Plan</td>
<td>Production of Climate Change Plan by 2012</td>
<td></td>
</tr>
<tr>
<td><strong>E9 Public realm</strong></td>
<td>7, 12, 13, 14, 15, 16, 20 EEBC, Surrey County Council, developers, private landowners, Local Strategic Partnership and other partners such as the University for the Creative Arts and Chamber of Commerce</td>
<td>This policy will be delivered throughout the plan period. Some actions can be delivered during the early part (2010 to 2012) such as the rationalisation of signage &amp; street furniture and the introduction of an agreed palette of street furniture and shop front / signage strategy.</td>
<td>Rationalisation of signage and street furniture  The introduction of:  i) An agreed uniform palette of street furniture/ materials  ii) A shop front / signage strategy</td>
<td>Audit and rationalisation of signage and street furniture by 2012  Identification of palette of material and production of strategy by 2012  Service level agreement between Surrey County Council and EEBC to adhere to comply with the strategy  Create green links through the town centre  Increased public art in the town centre  Each town centre development to make a contribution towards public art</td>
<td></td>
</tr>
<tr>
<td>E10 Cycle &amp; public transport improvements</td>
<td>EEBC, Surrey County Council, developers, Network Rail</td>
<td>Improvements to existing routes may be achieved during 2010 to 2016, while new development may present opportunities throughout the plan period. The levels of cycle parking provision and the regeneration of Epsom Station should be achieved by 2016</td>
<td>Additional improvements to current dedicated cycle routes across the Town Centre</td>
<td>Provide a contra-flow lane through Station Approach and shared cycle path and footway along East Street</td>
<td></td>
</tr>
<tr>
<td>E11 Deliveries to premises</td>
<td>EEBC, Surrey County Council, Retailers, Chamber of commerce</td>
<td>2010 to 2026 Improvements in enforcement should be delivered during the early part of the plan period, while other elements such as improving access to rear servicing may be delivered throughout the plan</td>
<td>Traffic flows in key locations across the town centre (effectiveness of the SCOOT system)</td>
<td>Reduction in average journey times</td>
<td></td>
</tr>
</tbody>
</table>

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35 E10: In the Surrey LTP 2 a target is to increase the average number of cycle trips by 20% between 2004 and 2010. It is reasonable to assume that this increase could translate into an increase in cycle parking provision.
<table>
<thead>
<tr>
<th>Period</th>
<th>Traffic orders in relation to servicing</th>
<th>Review traffic orders in relation to servicing arrangements</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Development and implementation of parking strategy (management and charging regimes)</td>
<td>Commence work on a parking strategy by 2010</td>
</tr>
<tr>
<td>7, 8</td>
<td>Modelling of traffic schemes</td>
<td>Detailed modelling of returning South Street to two-way</td>
</tr>
<tr>
<td>1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 15</td>
<td>Preparation of a development brief (once produced, the Development Brief will be subject to an additional monitoring regime)</td>
<td>Development brief to be prepared for Depot Road / Upper High Street site</td>
</tr>
<tr>
<td>1, 3, 4, 5, 6, 9, 10, 13, 15</td>
<td>Preparation of a development brief (once produced, the Development Brief will be subject to an additional monitoring regime)</td>
<td>Development brief to be prepared for the Utilities site, East Street</td>
</tr>
<tr>
<td>1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 17, 20</td>
<td>Preparation of a development brief (once produced, the Development Brief will be subject to an additional monitoring regime)</td>
<td>Development brief to be prepared for the Epsom Station site</td>
</tr>
<tr>
<td>All objectives</td>
<td>Development and / or enhancement of the opportunity sites</td>
<td>Development and / or enhancement of site inline with the criteria set out in policy E17</td>
</tr>
<tr>
<td>Pedestrian movement</td>
<td>7, 10</td>
<td>EEBC, Surrey County Council, developers</td>
</tr>
<tr>
<td>---------------------</td>
<td>-------</td>
<td>-----------------------------------------</td>
</tr>
<tr>
<td>Management and promotion of Epsom town centre</td>
<td>21, 20</td>
<td>EEBC, Surrey County Council (Chamber of Commerce), Epsom town centre retailers and businesses, LSP sub group</td>
</tr>
</tbody>
</table>

The Council has sufficient resources to monitor the above identified indicators. These will be measured alongside other indicators monitored by LSP partners. These may include additional indicators such as levels of anti social behavior, implementation of real time passenger transport information system and average journey times through the Town entre.
Appendix 4

Superseded Local Plan policies

1. **Policy HSG3 Housing Site Allocations:** This policy is part superseded by Plan E Policy E15, which allocates the redevelopment of the Surrey Institute of Art and Design, Linton’s Lane (Policy HSG3(5)) for a mix of uses.

2. **Policy BE19 Design of New Buildings:** This policy is part superseded by Plan E Policy E7. Specifically, Policy E7 supersedes BE19 (II).

3. **Policy EMP3 Epsom Town Centre Business Areas:** This policy has been superseded in its entirety by Plan E Policy E5 and site specific Policies E14 – E17.

4. **Policy SH3 Changes of Use in Shopping Areas:** This policy has been part superseded by Plan E Policy E4, which seeks to guide changes of uses within Epsom’s town centre retail area, and primary and secondary retail frontages. Policy SH3 still currently applies for the shopping areas outside of Epsom Town Centre.

5. **Policy MV11 Public Off-Street Parking Enhancements:** This policy has effectively been superseded by Plan E Policy E14, which seeks the enhancement of off-street provision at Upper High Street and Depot Road car parks. The car park at High Street/ Waterloo Road (as referenced in Policy MV11) has already been the subject of enhancement measures during the life of the local plan.

6. **Policy IMP1 Epsom Railway Station Site:** This policy has been superseded in its entirety by Plan Policy E16, which allocates the redevelopment of Epsom Station for a mix of uses.

7. **Policy IMP2 Rainbow Centre and Neighbouring Land, East Street:** This policy has been superseded in its entirety by Plan E Policy E15, which allocates the redevelopment/ regeneration of the site for a mix of uses.

8. **Policy IMP3 Surrey Institute of Art and Design and Youth Centre, Linton’s Lane:** This policy has been superseded in its entirety by Plan E Policy E15, which allocates the redevelopment/ regeneration of the site for a mix of uses.
Appendix 5
Plan E

Housing phasing Table

The table below summarises the sites within Plan E, which are expected to yield housing. Where no timescales have been specified for the smaller sites within Plan E, the timescales suggested in the SHLAA have been used.

Plan E housing figures

<table>
<thead>
<tr>
<th>Policy</th>
<th>Site</th>
<th>No of units projected</th>
<th>Projected Timescales</th>
</tr>
</thead>
<tbody>
<tr>
<td>E14</td>
<td>Depot Road and Upper High Street</td>
<td>130 (min) including 52 affordable</td>
<td>2010-2016</td>
</tr>
<tr>
<td>E15</td>
<td>The Utilities Site</td>
<td>250 (min) including 100 affordable</td>
<td>2010-2026 (later)</td>
</tr>
<tr>
<td>E16</td>
<td>Epsom Station Site</td>
<td>100 (min) (124 approved) including 40 affordable</td>
<td>2010-2016</td>
</tr>
<tr>
<td>E17</td>
<td>Magistrates Court</td>
<td>60 including 24 affordable</td>
<td>2008-13</td>
</tr>
<tr>
<td>E17</td>
<td>Emergency Service Uses, Church St</td>
<td>50 including 20 affordable</td>
<td>2015-2020</td>
</tr>
<tr>
<td>E17</td>
<td>TK Maxx Store</td>
<td>65 including 26 affordable</td>
<td>2020-26</td>
</tr>
<tr>
<td>E17</td>
<td>Land rear of the Albion public House</td>
<td>8 including 2 affordable</td>
<td>2020-26</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>687 units</td>
<td></td>
</tr>
</tbody>
</table>

The Council’s most recently published Annual Monitoring Report, containing the most up to date housing trajectory, can be found on the Council’s website at the link below:

Appendix 6

Retail Glossary

Definitions from Planning Policy Statement 4: Planning for Sustainable Economic Growth

**Town Centre:**
Defined area, including the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area.

**Primary Shopping Area:**
Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are contiguous and closely related to the primary shopping frontage).

**Primary Frontage:**
Primary frontages are likely to include a high proportion of retail uses.

**Secondary Frontage:**
Secondary frontages provide greater opportunities for a diversity of uses.

**Edge-of-Centre**
For retail purposes, a location that is well connected to and within easy walking distance (i.e. up to 300 metres) of the primary shopping area. For all other main town centre uses, this is likely to be within 300 metres of a town centre boundary. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances. For example, local topography will affect pedestrians' perceptions of easy walking distance from the centre. Other considerations include barriers, such as crossing major roads and car parks, the attractiveness and perceived safety of the route and the strength of attraction and size of the town centre. A site will not be well connected to a centre where it is physically separated from it by a barrier such as a major road, railway line or river and there is no existing or proposed pedestrian route which provides safe and convenient access to the centre.

**Out-of-Centre**
A location which is not in or on the edge of a centre but not necessarily outside the urban area.

**Out-of-Town**
An out-of-centre development outside the existing urban area.

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36 For office development, locations outside the town centre but within 500 metres of a public transport interchange, including railway and bus stations, within the urban area should be considered as edge-of-centre locations for purposes of the sequential approach.