

LICENSING AND PLANNING POLICY COMMITTEE

Thursday 10 December 2015 at 7.30 pm

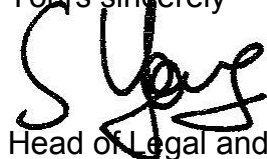
Council Chamber - Epsom Town Hall

The members listed below are summoned to attend the Licensing and Planning Policy Committee meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

Councillor Graham Dudley
(Chairman)
Councillor David Wood (Vice-
Chairman)
Councillor Michael Arthur
Councillor Tony Axelrod
Councillor Rob Geleit

Councillor Tina Mountain
Councillor Martin Olney
Councillor David Reeve
Councillor Humphrey Reynolds
Councillor Clive Smitheram

Yours sincerely



Head of Legal and Democratic Services

For further information, please contact Sandra Dessent, 01372 732121 or
sdessent@epsom-ewell.gov.uk

AGENDA

1. QUESTION TIME

To take any questions from members of the the Public

Please note: Members of the Public are requested to inform the Democratic Services Officer before the meeting begins if they wish to ask a verbal question to the Committee.

2. MINUTES OF PREVIOUS MEETING (Pages 5 - 8)

The Committee is asked to confirm as a true record the Minutes of the Meeting of the Committee held on 22 October 2015 (attached) and to authorise the Chairman to sign them.

3. DECLARATIONS OF INTEREST

Members are asked to declare the existence and nature of any Disclosable Pecuniary Interests in respect of any item of business to be considered at the meeting.

4. ARTICLE 4 DIRECTIONS - OFFICE BLOCKS (Pages 9 - 90)

Following the Secretary of State's decision to extend the permitted development regime relating to a change of use from office to residential it is proposed to use a highly focused Article 4 Direction to protect buildings and sites in Epsom Town Centre that have been assessed as being at risk.

There is still significant concern that this change in the permitted development regime will have a harmful impact upon the economic vitality and viability of Epsom Town Centre, particularly in relation to our existing occupied and viable office stock. There is equal concern that it will undermine our adopted strategy for the Town Centre and our ability to maintain and develop balanced sustainable communities.

The Report and accompanying Study set out the justification for introducing an Article 4 Direction on specific sites and buildings in Epsom Town Centre, in order to manage proposals seeking change of use from Class B1 (Office) to Class C3 (Residential) and for three buildings from Class A2 (Financial & Professional Services) to Class C3 (Residential).

5. CROSSRAIL 2 CONSULTATION (Pages 91 - 94)

Crossrail 2 is a proposed new railway that could serve London and the wider South East of England. It is envisaged that one of its southern branches would extend into Epsom.

Transport for London and Network Rail are currently seeking views on the proposal. Their consultation runs until January, 2016. This is an opportunity for the Borough Council to set out how it believes Crossrail 2 should benefit the Borough.

The Committee are asked to consider the implications of the Crossrail 2 proposal and the draft response to the current consultation (**to be distributed at the meeting**). Subject to any amendments, the response to be submitted to the consultation process.

6. PARKING STANDARDS - ADOPTION (Pages 95 - 118)

The Parking Standards for Residential Development Supplementary Planning Document (SPD) was approved by the Committee for public consultation in September 2015. The consultation has now closed.

This report provides an overview of the consultation comments received, Officers' responses, and possible amendments to the SPD as a result. Subject to the Committee's agreement to the minor amendments suggested through the consultation the SPD can now be adopted.

The Committee are asked to consider the responses and suggested amendments resulting from the consultation, and agree the Parking Standards for Residential Development Supplementary Planning Document (SPD) for adoption.

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**Minutes of the Meeting of the LICENSING AND PLANNING POLICY COMMITTEE
held on 22 October 2015**

PRESENT -

Councillor Graham Dudley (Chairman); Councillors Michael Arthur, Tony Axelrod, Tina Mountain, Martin Olney, David Reeve, Clive Smitheram and Mike Teasdale (as nominated substitute for Councillor David Wood)

Absent: Councillor David Wood, Councillor Rob Geleit and Councillor Humphrey Reynolds

Officers present: Karol Jakubczyk (Planning Policy Manager), Susie Legg (Policy Planner), Simon Young (Head of Legal and Democratic Services) and Eddie Nowak (Democratic Services Officer)

21 APPOINTMENT OF VICE-CHAIRMAN

In the absence of the Vice-Chairman, Councillor Clive Smitheram was appointed Vice-Chairman for this meeting.

22 QUESTION TIME

No questions were asked or had been submitted by members of the Public.

23 MINUTES OF PREVIOUS MEETING

The Minutes of the Meeting of the Licensing and Planning Policy Committee held on 17 September 2015 were agreed as a true record and signed by the Chairman.

24 DECLARATIONS OF INTEREST

No declarations of interest were made by Councillors in items on the agenda.

25 SITE ALLOCATIONS POLICIES DOCUMENT PRE-SUBMISSION DRAFT

The Committee was asked to consider the Site Allocations Policies Document Pre-Submission Draft, and subject to any amendments or additions, it be approved for a six week public consultation during Winter 2015, and that following the conclusion of the consultation, the document be submitted to the Secretary of State for Examination in Public.

It was noted that the Council's Site Allocations Policies Document identified and allocated the land needed to: deliver the Borough's Green Infrastructure and Heritage Assets Strategies; meet the Borough's future commercial needs; secure key pieces of community infrastructure; and deliver the Kiln Lane Link. By facilitating the development of these sites the Council would meet many of the strategic objectives set out in the Core Strategy. The Site Allocations Policies Document was principally comprised of new policies that identified and allocated sites either in their existing uses or for comprehensive redevelopment for the uses specified above. In addition to these site specific policies, this document also sets out the Council's Spatial Strategies for the Green Infrastructure and Heritage Asset networks.

Work on the Site Allocations Policies Document had been underway since 2007. During that time the Council had sought comments from local communities on site allocation options. The most recent of these being a consultation exercise that ran for ten weeks between October 2013 until January 2014. The consultation exercise also included a workshop session that was open to all Members. The outputs from that consultation exercise and subsequent workshop session have informed the preparation of the Pre-Submission Draft.

Members discussed the document, when the following points were noted:-

- Page 14 – footnote – “off-site” would replace “on-site”;
- Page 15 – footnote – the Planning and Policy Sub-Committee was the predecessor of the Licensing and Planning Policy Committee;
- Officers clarified that the document did not include sites allocated for housing. The Council had previously identified a number of preferred housing sites which were considered by the Planning Policy Sub-Committee in 2012. It was intended that these would be identified in a Supplementary Planning Document which would underpin the Council's housing trajectory set out in the Annual Monitoring Report to demonstrate how the Council would deliver its current housing target. If an application were to come forward for any of these preferred sites, it would be considered under the existing policies in the Local Plan, specifically Core Strategy Policy CS8;
- Officers had prepared a Map that sets out the Council's Green Infrastructure assets;
- The Landscape Character Study (2015) had been prepared for the Surrey local authorities by Surrey County Council and was available on the Council's website;

- Green infrastructure was an important component of the local economy and by making a contribution to the Borough's visual character and appearance it helped to attract new businesses. The Strategic Housing Market Assessment did take into account employment and commuting patterns;
- The Key Diagram referred to in paragraph 2.14 would be amended to include the major highway network. It was pointed out that this additional work would result in a slight delay to the proposed consultation process;
- The extent of the Longmead & Nonsuch Employment Areas would be shown on the Proposals Map;
- Out-of-centre retail facilities included Petrol Filling Stations that incorporated retail.

Accordingly, it was agreed that the Site Allocations Policies Document Pre-Submission Draft, subject to the amendments and comments set out above, be approved for a six week public consultation during Winter 2015, and that following conclusion of the consultation, the Document be submitted to the Secretary of State for Examination in Public.

26 REVISED SUSTAINABLE DESIGN SUPPLEMENTARY PLANNING DOCUMENT

The Committee was asked to consider the Revised Sustainable Design Supplementary Planning Document Draft, and subject to any amendments or additions, it be approved for a six week public consultation during Winter 2015.

Subject to Members' agreement and in accordance with the Regulations, the document would undergo a 6 week period of public consultation. This provided the Borough's local communities and others with an interest in the planning system with an opportunity to influence the contents of the revised document. It also provided necessary weight and defensibility to its contents, should the Council seek to challenge information submitted by applicants as part of a development proposal. Following the closure of the consultation period, any appropriate amendments would be made to the document and it would be brought before Licensing and Planning Policy Committee to be considered for adoption.

Members discussed the document, when the following points were noted:-

- The purpose of url's (links to web pages) in documents such as this was to facilitate on-line access to background information, although it was the intention to review the Council wide use of url's;

- A BREEAM assessment was a two stage process. The first part of the assessment was undertaken during the design stage, to indicate the likely score for the scheme. The second stage was undertaken post construction, and reviewed the design stage assessment to ensure all the specified issues had been implemented;
- If the required standard had not been achieved at the construction stage, measures should be undertaken retrospectively to increase the BREEAM score until it met the required standard;
- Page 75 – paragraph 4.5 – substitute “formally” for “formerly”;
- Page 75 – paragraph 4.12 – add “and owner/occupier” at the end of the sentence.

The Committee thanked the officers for preparing the comprehensive and informative document, and agreed that the draft document, subject to the amendments and comments set out above, be approved for a six week public consultation during Winter 2015.

The meeting began at 7.30pm and ended at 8.55pm

COUNCILLOR GRAHAM DUDLEY
(CHAIRMAN)

**EPSOM TOWN CENTRE OFFICES AT RISK OF CONVERSION TO
RESIDENTIAL: PROPOSED ARTICLE 4 DIRECTION**

<u>Report of the:</u>	Head of Planning and Building Control
<u>Contact:</u>	Karol Jakubczyk
<u>Urgent Decision?(yes/no)</u>	No
<u>If yes, reason urgent decision required:</u>	
<u>Annexes/Appendices (attached):</u>	Annex 1: Epsom Town Centre Office Article 4 Direction Study
<u>Other available papers (not attached):</u>	Planning Policy Committee Agenda 23 October 2013 Item 5 East Street Offices Article 4 Direction Study Epsom Town Centre Office Demand Study February 2013

REPORT SUMMARY

Following the Secretary of State's decision to extend the permitted development regime relating to a change of use from office to residential it is proposed to use a highly focused Article 4 Direction to protect buildings and sites in Epsom Town Centre that have been assessed as being at risk.

There is still significant concern that this change in the permitted development regime will have a harmful impact upon the economic vitality and viability of Epsom Town Centre, particularly in relation to our existing occupied and viable office stock. There is equal concern that it will undermine our adopted strategy for the Town Centre and our ability to maintain and develop balanced sustainable communities.

The Report and accompanying Study set out the justification for introducing Article 4 Directions on specific sites and buildings in Epsom Town Centre.

RECOMMENDATION

1. The Committee agrees that the Council pursue the introduction of an Article 4 Direction for selected buildings and sites in Epsom Town Centre in order to manage proposals seeking changes of use from Class B1 (Office) to Class C3 (Residential).
2. The Committee considers serving different Article 4 Directions on three specific buildings in order to manage proposals seeking changes of use from Class A2 (Financial & Professional Services) to Class C3 (Residential).

Notes

1 Implications for the Council's Key Priorities, Service Plans and Community Strategy

- 1.1 The Permitted Development (PD) regime is a very important component of the planning system. Development that is thereby automatically approved by Government order can have a significant effect on the Council's ability to control development and a consequent impact on the built and natural environment. The impact of such development has a bearing on many of the Council's key priorities including economic vitality, quality of life, visual appearance and sustainability.
- 1.2 The Annual Service Plan includes related planning policy objectives and an overarching objective of Economic Vitality, the achievement of which could be affected by the implementation of the proposed extended PD rights.
- 1.3 Plan E forms a key part of the Epsom & Ewell Borough Local Plan, which assists in the spatial delivery of the objectives of the Sustainable Community Strategy and the Council's Key Priorities.

2 Background

- 2.1 In May 2013 the previous government introduced changes to the PD Regime relating to changes of use from Class B1 (Office) to C3 (Residential). In response to this change in the PD Regime the Council unsuccessfully applied for an exemption for the whole of Epsom Town Centre. Our case for exemption was set out in a report to the Planning Policy Sub-Committee on 27 February 2013.
- 2.2 In response to the previous government's decision we successfully introduced Article 4 Directions, removing the right to changes of use from Class B1 (Office) to C3 (residential), on three buildings located on East Street Epsom. These were Adelphi Court, Crossways House and Bradford House. These Article 4 Directions were supported by evidence that assessed the level of risk.
- 2.3 Early this year the government indicated that they would be extending and expanding the PD Regime relating to changes of use from offices to residential uses as part of the Housing and Planning Bill. It is anticipated that the changes will be either extended until 2019 (the current changes expire in 2016), or made permanent. The government has also stated that the PD Regime will be expanded to allow for the demolition of office and erection of new residential uses without the need for planning permission (the current PD Regime only allows for conversion with minimal external alterations). We anticipate that these new changes will be made during the first quarter of 2016.

- 2.4 Since the introduction of the changes in 2013, Epsom Town Centre has experienced a visible loss of office floorspace to new residential uses through the PD route. This has notably included viable Grade A or good quality stock, such as Rutland House, Novellus Court¹ and Charles Stuart House. Officers are aware that of interest from landowners to change the use of viable, occupied office buildings into residential accommodation. Local property agents have also expressed their concern.
- 2.5 We are concerned about the forthcoming changes to the PD regime. Further unmanaged changes of use from office to residential could have a profound impact upon not only our economic strategy for Epsom Town Centre but also its visual character and appearance. There are also significant concerns about the quality of residential accommodation that result from conversions, the absence of any affordable housing provision and potential transport impacts². Consequently, the introduction of Article 4 Directions on specific buildings and sites is recommended as an appropriate mechanism to manage change on those sites. The Planning Policy Sub-Committee originally agreed to this approach on 27 February 2013.
- 2.6 Officers have prepared a new Study that assesses the level of risk to individual office buildings and sites across Epsom Town Centre. The Study identifies those buildings and sites that merit protection through the introduction of Article 4 Directions. A copy of the Study is enclosed under Annex 1.

3 Epsom Town Centre Office to Residential Article 4 Directions

- 3.1 An Article [4] Direction removes certain types of PD Rights which landowners are normally allowed to carry out without the requirement to apply for Planning Permission. In this case we propose to remove the PD right to changes of use from Class B1 (Office) to C3 (Residential). As stated above we have already served Article 4 Directions to protect specific office buildings and we have also served them on many of our Conservation Areas removing PD rights from householders.
- 3.2 In order to remain in the spirit and intent of the government's changes to the PD regime and ensure consistency with national planning policy site specific, rather than a Town Centre wide, Article 4 Directions are proposed. These new Directions seek to protect only those buildings and sites that are the most appropriate and sustainable locations for employment/ commercial activity (either in office or other employment uses) that are assessed as being at risk from conversion to residential use.

¹ The redevelopment of this site was initially pursued through the PD route but has subsequently been converted following a planning application that sought significant external changes to the exterior of the building.

² Under the PD regime we are unable to enforce our accommodation space standards, affordable housing and parking standards policies.

- 3.3 The Study identifies the following buildings and sites as being at risk and recommends that they be served with Article 4 Directions in order to manage proposals seeking change of use from B1 (office) use to C3 (residential):

- a) Oaks House, West Street
- b) Parkside House, Ashley Avenue
- c) The Kirkgate, Church Street
- d) The Wells, Church Street
- e) Adelphi Court, East Street
- f) Epsom Chase, Hook Road
- g) Sollis House, Hook Road
- h) Bradford House, East Street
- i) Global House, Ashley Avenue
- j) Epsom Gateway, Ashley Avenue
- k) Horizon House, Upper High Street
- l) 30 – 38 Upper High Street
- m) Emerald House, East Street
- n) Newplan House, East Street
- o) Nightingale House, East Street
- p) Eastleigh House, East Street

- 3.4 The Study also identifies the three buildings as being in A2 (financial and professional service) use. These buildings could still come forward for conversion to residential under Class M of the General Permitted Development Order 2015. However, this would be a more onerous process. Nevertheless, the Council may wish to consider the benefit of serving Article 4 Directions on these three buildings:

- a) Job Centre, East Street
- b) Glen House, East Street
- c) 69 – 71 East Street

- 3.5 A map identifying all of the above sites is included as part of the Study under Annex 1.

4 Financial and Manpower Implications

- 4.1 The resourcing of the current Local Plan work programme was approved by the Licensing and Planning Policy Committee in September 2014. That work programme did not factor in any additional work required to safeguard our employment land from expanded changes to the PD Regime. Consequently, some adjustment in our priorities may be necessary.
- 4.2 Should the concerns set out above be borne out we may find ourselves in a situation where the increase in resident population is not matched by Community Infrastructure Levy contributions. This situation may be partially tempered through increases in revenue from Council Tax and New Homes Bonus.

- 4.3 The changes to the PD Regime have not resulted in reduced workloads for the Council's Development Management Team. The Prior Approval regime and the fact that external alterations to a building still require permission mean that there will still be work required in assessing proposals.
- 4.4 The introduction of the Article 4 Direction will ensure that an application comes forward as it did previously. Planning applications that result from the introduction of the Article 4 Direction will therefore be absorbed within current staffing levels and workloads.

5 Equalities and Other Legal Implications

- 5.1 In order to implement the Article 4 Direction we will need to follow a formal process, which will involve consultation with all landowners affected by the Direction.

6 Sustainability Policy and Community Safety Implications

- 6.1 Safeguarding our portfolio of employment land will contribute towards delivering the Council's objectives for maintaining and enhancing the Borough as a sustainable place to live, work and visit.
- 6.2 Both the Core Strategy's and Plan E's policies for employment uses and Epsom Town Centre have been subject to sustainability appraisal as an integral part of the Local Plan process. These sustainability appraisals have been subject to public consultation.
- 6.3 There are no significant Community Safety considerations.

7 Partnerships

- 7.1 No specific considerations.

8 Risk Assessment

- 8.1 The changes to the PD Regime place a risk on our ability to deliver our economic and Town Centre strategies. Other significant risks were set out in the reports to the previous Council Committees and include: inappropriate sites coming forward for housing, inability to secure any affordable housing and difficulties in securing contributions through the Community Infrastructure Levy.

9 Conclusion and Recommendations

- 9.1 The Committee are asked to agree that the Council pursue the introduction of Article 4 Directions on specific buildings and sites (as recommended by the accompanying Study) in Epsom Town Centre.

- 9.2 The Committee considers serving different Article 4 Directions on three specific buildings in order to manage proposals seeking changes of use from Class A2 (Financial & Professional Services) to Class C3 (Residential).

WARD(S) AFFECTED: All



Epsom Town Centre Office to Residential Article 4 Direction Study



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1. Introduction

- 1.1 This Study has been prepared by the Council as direct response to the Secretary of State's decision to extend and expand the changes to the permitted regime that allow the conversion of office buildings to residential use without the need for a planning application.
- 1.2 The permitted development regime is a very important component of the planning system. Development that is thereby automatically approved by Government order can have a significant effect on the Council's ability to control development and a consequent impact on the built and natural environment. The impact of such development has a bearing on many of the Council's key priorities including economic vitality, quality of life, visual appearance and sustainability.
- 1.4 The Council previously applied for an exemption for the whole of Epsom Town Centre but was unsuccessful. In order to retain an ability to intervene the Borough Council served Article 4 Directions removing permitted development rights on three office buildings and sites assessed as being at greatest risk from being lost to residential use. A similar study to this one was prepared to provide supporting evidence. This Study builds upon that initial study, taking advantage of a wider evidence and knowledge base, developed since the original changes to the Permitted Development Regime were made.
- 1.5 The Council believes that new Article 4 Directions are justified on the basis that this will provide an appropriate level of intervention in order to:
 - Manage proposals that seek a change of use from office to residential to ensure that there is no adverse impact upon the economic vitality and viability on Epsom Town Centre or the Borough's wider employment offer;
 - Manage the local office/ employment market's transition, following the recent periods of economic instability, in order to ensure that other commercial/ employment uses are fully considered prior to releasing buildings/ sites to residential use; and to ensure that mixed-use options are also fully considered; and
 - Ensure that use of the Town Centre's/ Borough's most sustainable employment sites is optimized.
- 1.6 The Study will be submitted as part of a report to the Council's Licensing and Planning Policy Committee recommending the introduction of further Article 4 Directions on specific buildings and sites located in and around Epsom Town Centre.
- 1.7 Following this the Study will be used to inform the preparation of future planning policy. It is likely that it will also be used to inform other

Council economic development initiatives seeking to maintain and enhance the employment offer across the Town Centre.

2. Objectives

2.1 The Study seeks to meet the following objectives:

- To establish how the Borough Council can maintain its corporate and local plan strategy for qualitative sustainable economic/ commercial growth following further changes to the permitted development regime;
- To establish whether there is any merit in serving additional Article 4 Directions on office buildings and/ or employment sites located in and around Epsom Town Centre in order to manage proposals to change their use;
- To identify those key office properties/ sites located in and around Epsom Town Centre that remain valued for their employment potential and which are now at risk from unmanaged changes in use following further changes to the Permitted Development regime; and
- To identify specific sites upon which to serve Article 4 Directions removing the permitted development right to change use from office to residential, should this course of action been deemed necessary.

2.2 The principle output from the Study will be to provide the supporting evidence for site specific Article 4 Directions that will remove the permitted development right to change the use of an office building (Use Class B1) into residential accommodation (Use Class C3). This will include the proposed permitted development right allowing demolition and replacement of existing office uses with new residential uses.

3. Policy Context

3.1 The following section provides a brief overview of the national and local planning policy context for the Study.

3.2 The National Planning Policy Framework (NPPF) provides the basic planning policy framework for preparing local plans and for decision making within the context of the development management process. NPPF Para 21 states that planning authorities should:

“support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;”

3.3 In the case of Epsom Town Centre's office stock, our local plan evidence base and annual monitoring data demonstrates that our local office market has contracted (following the sustained periods of recession). Nevertheless, Epsom Town Centre remains a highly accessible and sustainable location for employment and other commercial activities. Taking account of Borough-wide employment land supply, it continues to be an appropriate location for employment uses.

3.4 The NPPF continues by stating that:

"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

3.5 The Council regularly monitors the Borough's employment sites. This is primarily done through the local plan annual monitoring process. Since 2007, employment land studies have also helped to inform the local plan process. Since the introduction of the changes to the permitted development regime (in 2013) the Council has carefully monitored office portfolio – with the specific objective of retaining its best office stock. This approach reflects national policy. The Study reflects this through its conclusions (on individual sites) and recommendations.

3.6 In terms of planning for town centres, the NPPF sets out a town centre first approach, something which the Council has taken forward in the development of local planning policy. The NPPF, under Paragraph 23, makes the following key statements, which are relevant to the Study:

"Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;*

- *allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;*
- *recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and*
- *where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.”*

3.7 As stated above the Council has taken a positive town centre first approach, which is reflected in the Sustainable Community Strategy, the Core Strategy and Plan E. The Council's visions and strategies for the Town Centre focus upon meeting the identified retail, housing and business needs of local communities; these being firmly rooted in evidence of demand. In order to meet these needs the Council has, through Plan E, identified and where necessary allocated sites for these specific uses. The Council's approach is entirely consistent with national planning policy.

3.8 Whilst the Council has not allocated specific employment areas in Epsom Town Centre, it has set out a series of Visions for the areas that comprise the Town Centre (within Plan E). These clearly set out how areas such as East Street and Ashley Avenue function as the Town Centre's main business districts, and how they will be maintained and enhanced during the plan period. Again, this is a positive approach to planning for sustainable commercial growth, which is consistent with national planning policy.

3.9 The Council recognises that its local office market has been subject to restructuring during the recent period of economic recessions. There is also an understanding that there is limited market demand for lower grade office stock (either within Epsom or the wider South West London market). Nevertheless, Epsom Town Centre remains the most sustainable location within the whole Borough for high density employment growth. By taking measures to safeguard those sites that remain valuable for sustainable employment growth and are at most risk from the recent changes to the permitted development regime the Council are taking positive measures to plan for future growth in accordance with national planning policy.

- 3.10 In 2013 the government amended the General Permitted Development Order to allow the change of use of offices falling under Use Class B1(a) to residential uses falling under Use Class C3. This change of use is subject to a mechanism known as “Prior Approval”, whereby the Council must assess the impact of the change of use on transport and highways, as well as the contamination risks and flooding risks at the site before allowing the change of use. This Permitted Development Right was allowed for a three year period between May 2013 and May 2016.
- 3.11 Prior to making the amendment to the Order, the government invited applications for exemption from the changes for defined areas of land. The Borough Council applied for an exemption covering the whole of Epsom Town Centre as defined in Plan E; however, we were unsuccessful. Subsequently, the Borough Council pursued the introduction of Article 4 Directions on three office buildings on East Street that were deemed to be at greatest risk from conversion under Permitted Development Rights. The Council’s approach of assessing risk, targeting the specific sites at greatest risk and then serving Article 4 Directions has proved successful and in accordance with national planning policy and legislation.
- 3.12 In April 2015 the General Permitted Development Order was consolidated and several new Permitted Development Rights were introduced. Currently, the right to change from B1 (a) office to C3 residential use remains in effect temporarily until May 2016. However, the government is known to be preparing to make these rights permanent. They will also be extended to include necessary external works and to allow the demolition of existing office buildings and their replacement with new build residential, as announced in the statement of the Housing and Planning Minister Brandon Lewis of 13 October 2015. The timeframe for this is expected to become clearer after the Housing and Planning Bill, currently going through parliament, is passed. In anticipation of these changes, Officers have prepared this Study to assess the potential risk to the Borough’s remaining Town Centre office stock.
- 3.13 The Council’s corporate and Local Plan strategies are predicated on Epsom Town Centre remaining the most appropriate and sustainable location for commercial activity in the whole of the Borough. The following documents provide the local policy context for seeking to safeguard office buildings/ sites that continue to be important to our employment strategy – our [Corporate Plan](#); our [Sustainable Community Strategy](#); the [Epsom & Ewell Core Strategy](#); [Plan E Epsom Town Centre Area Action Plan](#); and [Development Management Policies Document](#).

4. Impact of Permitted Development Regime Changes on Epsom Town Centre

- 4.1 The Council unsuccessfully applied to the Secretary of State for an exemption from the changes to the permitted development regime during February 2013. The Council's application was made on the grounds the changes would undermine adopted strategies relating to employment and Epsom Town Centre. The Council noted that employment land supply within the Borough is heavily constrained and it is unlikely that we would be able to identify suitable and sustainable new employment sites to make-good any losses that would result from this loss of control. The Council's strategy has been to optimise existing stock and sites, which are already in the most sustainable locations rather than to seek new sites.
- 4.2 Within its application the Council also highlighted its strong housing delivery performance, having had in excess of ten years available housing land supply.
- 4.3 Consequently, the Council's case of exempting Epsom Town Centre from the new permitted development regime was made on the basis of the following points:
- a) There would inevitably be a significant loss of employment floor space in Epsom Town Centre due to commercial pressures. This would fundamentally damage the employment-base of the Borough and strengthen less-sustainable patterns of development and make the Borough even more dependent upon outward-commuting. Towns such as Epsom, within close proximity to London, are particularly vulnerable to this. When prospects improve, many of the best employment sites may have been lost.
 - b) The Council has an established strategy for focussing economic growth on Epsom Town Centre, which continues to be the most sustainable location for commercial and economic activity in the Borough. This approach is key to the Council's corporate and planning policies and is being actively pursued with partners. This approach is consistent with national planning policy, particularly in respect of the "town centre first" approach;
 - c) The Town Centre is practically the only location in the Borough where there is a supply of available employment land; either in terms of developable sites or vacant premises. The constraints that envelop the Borough (including the Green Belt) limit the potential supply of new sites, which otherwise wouldn't be in the Town Centre and would be less sustainable; and

- d) The Council has a very healthy supply of deliverable and developable housing sites and consequently we don't need to release additional sources of supply – especially sources that will not contribute towards meeting our affordable housing target.

- 4.5 From the outset the Council considered another option, namely the introduction of an Article 4 Direction on all or part of East Street. In order to support this approach the Council prepared the East Street Epsom Article 4 Direction Study (2013), which assessed the risk (as it was understood at the time) of loss of existing office stock to residential uses. That previous Study identified three office buildings/ sites that would benefit from Article 4 Directions - the three sites being Adelphi Court, Bradford House and Crossways House.
- 4.6 The previous Study formed the basis of a Report to the Council's Planning Policy Committee recommending the immediate serving of Article 4 Directions upon these buildings/ sites. This action was confirmed during October 2013. As per the Regulations, the Secretary of State was informed of the Article 4 Directions but chose not to intervene.
- 4.7 Since serving of the three Article 4 Directions, the Council has considered and determined an application to comprehensively redevelop the Crossways House and Bradford House site for a mixed-use development comprised of student accommodation (C1 use class) and commercial uses (ground floor). This is in the process of being partially implemented on the Crossways House site; Bradford House currently remaining available as office accommodation. Adelphi Court, which had been identified as being at high risk, continues to provide viable office accommodation and is fully occupied. The Council considers the three Article 4 Directions to have been a success.
- 4.8 Since the introduction of the changes to the Permitted Development Regime, the Council has been monitoring the wider impacts to the Town Centre's office stock. The latest assessment of the impacts is included under Appendix A. A table setting out all of the office buildings and sites across the Borough lost through the Permitted Development Regime is included under Appendix B. The locations of office buildings lost through the Permitted Development Regime and through planning permissions are identified under Map 1.

- 4.9 The latest assessment identifies that the Council's local plan policies are being undermined by developments coming forward through the Permitted Development regime. This suggests that although successful, the initial Article 4 Directions were too narrowly focused. The assessment notes that whilst the overall number buildings lost has been limited, the office stock has generally been good quality, located in the Town Centre rather than poorer quality, high vacancy properties. The Borough Council did not anticipate the changes to the Permitted Development Regime having such a harmful impact upon viable good quality office stock. As a consequence the current Study needs to be expanded in scope, taking account of the potential threat to the remaining sources of employment floorspace.
- 4.10 It is noted that whilst the lost office sites have yielded new residential accommodation it has typically taken the form of high-value units that do not fully meet local needs. These new residential units have not included any affordable units, which is an acute area of local need. Our evidence also demonstrates that the Council has experienced a reduction in revenue from business rates due to the loss of viable office accommodation.
- 4.11 Elsewhere in the Gatwick Diamond area¹, intelligence suggests that Crawley is experiencing a similar situation to Epsom; namely, the loss of high quality office stock to residential accommodation. Whilst Crawley is markedly different from Epsom in many respects it shares some similarities; most notably that it has limited sources of supply of new employment land/ floorspace. The Borough Council understands that Crawley Borough Council is considering serving Article 4 Directions. It is noted that the Gatwick Diamond Initiative supports the introduction of Article 4 Directions to manage the retention of viable office stock.
- 4.12 In conclusion, in order to successfully implement the Borough Council's local plan growth strategy, particularly the improvements identified in Plan E Epsom Town Centre Area Action it will become even more important to have quality office stock to attract and retain business in the Town Centre. Without it the Town Centre's vitality and viability will be significantly eroded. The introduction of new Article 4 Directions, served upon buildings and sites assessed as being at risk provides an appropriate mechanism to manage change and ensure the successful delivery of growth.

¹ The Gatwick Diamond Initiative is a business led economic area partnership that sites at the heart of the Coast to Capital Local Enterprise Partnership area.

5. Methodology

- 5.1 The Study has followed a relatively straightforward methodology. The first stage of the Study is to identify an initial area of search. The previous Article 4 Office Study focussed upon East Street, Epsom. This was because of the known concerns around office building vacancy rates, which had been highlighted by the Epsom Office Market Demand Assessment (March 2013). Evidence collated by the Borough Council since the serving of those initial Article 4 Directions demonstrates that a significantly wider range of office buildings are now at risk of being lost to residential uses. In particular, evidence demonstrates that viable, Grade A or high grade stock is at greatest risk. This includes buildings that are currently occupied. On that basis the Study covers a wider area – that includes sites falling within the Plan E Epsom Town Centre Boundary and its immediate hinterland.
- 5.2 Other intelligence, including recent planning history/ applications, pre-application enquiries and data on buildings/ sites known to be subject to active marketing was utilised to identify buildings/ sites for site survey visits. This initial stage of the process took the form of a desktop exercise.
- 5.3 The next stage of the process saw Officers visit the sites identified during the initial stage of the Study. The individual site surveys sought to establish the condition and quality of the building/ sites. The site visits also sought to establish the redevelopment potential of the individual sites, specifically how adaptable the buildings are in terms of conversion within the constraints of the permitted development regime. Officers made judgements on the convertibility of buildings based on a number of criteria including their condition, external design (specifically access and fenestration) and where possible their internal layout. Officers also made complimentary assessments on whether the buildings and sites remain fit-for-purpose as employment sites, either in their current form or through comprehensive redevelopment.
- 5.4 The outputs from the site survey stage were in the main recorded on-site. Additional details, such as those relating to parking, marketing, building floor area and proximity to public transport were completed through on-line research and the use of GIS. A photographic record of each site was made during the course of the site visits.

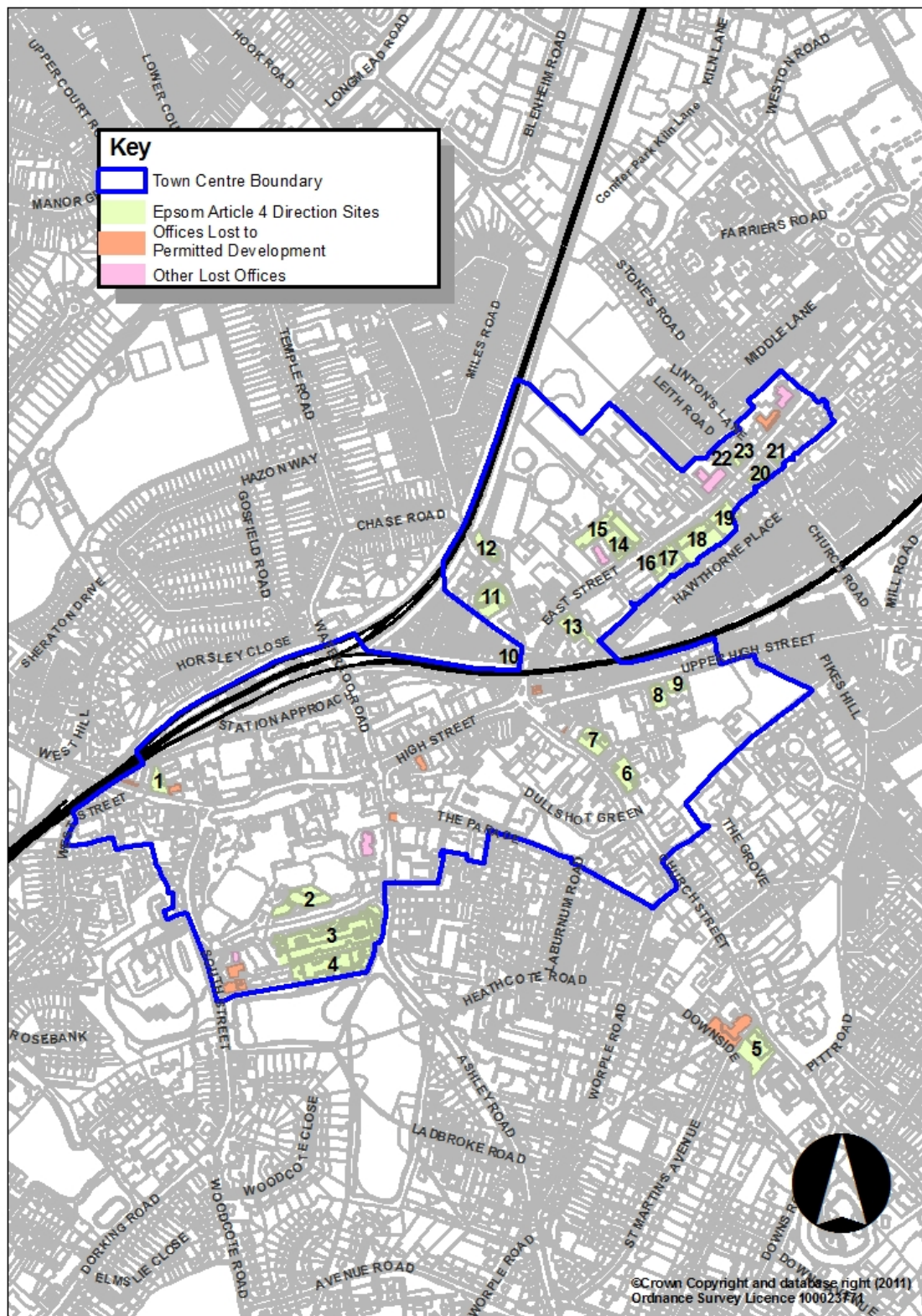
5.5 The Council has sought to develop the methodology used in the original study in order to provide a more comprehensive assessment of risk. In order to provide a greater focus for potential sites for Article 4 Directions the following additional criteria were considered when identifying sites. To ensure that the Study's outcomes are robust and defensible it was agreed that all sites needed to meet at least two of the above criteria to qualify for assessment for an Article 4 Direction:

- The office site is occupied and in active use – the Study has sought to establish the extent of ownership; particularly whether it is owner occupied; and the remaining length of tenancies. Where a candidate office is vacant, the Study identifies whether it is being actively marketed and for what uses it is being marketed. The latter may feed into intelligence as to whether it is at risk of loss to residential uses.
- The office site is rated as either good or Grade A stock – the Study has access to Co-Star² and other sources data (including information provided by local agents and marketing literature) to establish the quality of the stock, and whether it remains as viable, fit-for-purpose accommodation.
- The location of the site – specifically how sustainable the site is as a location for office uses. Given the high levels of accessibility available to sites located in Epsom Town Centre this criterion is met by most of the sites surveyed by this study.
- The site has been identified as an important employment location – the Study takes note of the Town Centre 'visions' identified in Plan E Epsom Town Centre Area Action Plan, and their collective contribution to the Town Centre's continued economic vitality and viability. For example, this criterion applies to sites located along East Street and in the Ashley Avenue/ Ashley Road area.
- The office site is known to be at risk – the Study takes account of intelligence available to the Council.
- Whether the site has previously been the subject of an Article 4 Direction - the Study seeks to re-assess whether the sites previously served with Article 4 Directions should be served with fresh Directions.

5.6 The Study was led and validated by the Council's Planning Policy Manager, who has in excess of twenty years' experience in the preparation of planning policy related studies.

² This is an established commercial property database that is used by both the public and private sector.

5.7 The map below sets out the sites surveyed during the course of the site visits. The corresponding data for each site follows in numerical order.



Map 1: Epsom Town Centre Offices

6. Building/ Site Survey Form

Site1

Site Address: Oaks House 16 – 22 West Street Epsom	Marketing Details: (if applicable) Stiles Harold Williams
Proximity to Station: About 250m Proximity to Public Transport: Directly opposite bus stop	Number of on-site parking spaces: Underground parking available
Length of time vacant/ subject to marketing Partially occupied. 2 vacant suites of 2,000 and 2,600 sq ft currently being advertised for rent.	
Size of Building/ site area: Total Rentable Building Area: 17,330 sq ft. Typical floor size: 4,332 sq ft. Site area approx. 650 sq m	
Condition of Building: Externally the building is in good condition. The building is a modern refurbished office that is partially occupied. It is in a prominent position at the corner of West Street and Station Approach. The building's current Co-Star rating is unknown. Accommodation is over four floors and the building benefits from comfort cooling, suspended ceilings with Category II lighting, lift and three compartment perimeter trunking.	
Employment/ Commercial Potential: Very High. The building is in a highly sustainable location in the heart of the Town Centre and is partially occupied. There is no basis to suggest it is not fit for continuing commercial use.	
Potential for Conversion into Residential and possible yield: Medium-High. The building could conceivably be converted to residential use as it exists with minimal external alterations, although the ground floor does not lend itself to easy conversion. If converted, this building could conceivably yield at least 20 units, possibly more with a higher density scheme.	
Level of risk of conversion under PD Regime: High. Although presently the ground floor does not lend itself to easy conversion there appears to be higher potential for the upper floors to be lost. However, if the principle of conversion were established via the granting of Prior Approval, the Council may struggle to resist the loss of this site. If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.	



Image 1. Oaks House, West Street, Epsom: modern office accommodation, located in the heart of Epsom Town Centre. This sustainable office building remains a viable employment site and merits consideration for an Article 4 Direction to protect it from loss through the permitted development regime to residential uses.

Site 2

Site Address: Global House Ashley Avenue Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 500m Proximity to Public Transport: Approximately 350m to bus stops on High Street	Number of on-site parking spaces: 75
Length of time vacant/ subject to marketing N/A - Serviced offices managed by City Skyline at least partially occupied	
Size of Building/ site area: Total Rentable Building Area: 60,300 sq ft. Typical size of 15,075 sq ft. Site size approx. 1,500 sq m	
Condition of Building: Fair. The building has a Co-Star rating of 3. Externally it appears in reasonable condition although may benefit from refurbishment having been built in 1981.	
Employment/ Commercial Potential: High. The site is in a highly sustainable location within the Town Centre and is close to public transport links. It is at least partially occupied and leased to tenants via City Skyline. Facilities include 24 hour access; meeting and conference rooms; lifts; comfort cooling.	
Potential for Conversion into Residential and possible yield: Whilst it is possible to envisage conversion, this appears difficult without external works to the building. There may also be access issues given that the building sits above the Ashley Centre and adjoins the Centre's car park. If converted, the site could conceivably deliver in around 80-100 units.	
Level of risk of conversion under PD Regime: At present the risk appears low due to the building's design and access issues. It would take significant external work to make the building fit for residential use. However, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.	



Image 2 Global House, Ashley Avenue, Epsom: this building provides modern serviced office accommodation in a highly sustainable central location. Conversion to residential appears unlikely. However, recent evidence from schemes that have come forward through the permitted development regime suggests that it could still be at risk. The government's proposal to expand the permitted development regime to include alterations and even demolition suggest that this site merits consideration for an Article 4 Direction.

Site 3

Site Address: Epsom Gateway Ashley Avenue Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 500m Proximity to Public Transport: Approximately 350m to bus stops on High Street	Number of on-site parking spaces: Underground parking available
Length of time vacant/ subject to marketing N/A – occupied by Atkins and Nuffield Health.	
Size of Building/ site area: Total Rentable Building Area: 80,000 sq ft. Typical Floor Size: 20,000 sq ft. Site size approx. 4,500 sq m	
Condition of Building: Good. The building has a Co-Star rating of 4. The building was renovated in 2012.	
Employment/ Commercial Potential: High – the site is fully occupied by two large employers. It is in a highly sustainable location in the Town Centre and close to public transport links. It also benefits from underground parking on-site.	
Potential for Conversion into Residential and possible yield: At present the risk of conversion appears low. The building's design does not easily lend itself to conversion as it exists currently. The ground floor and roof areas would need to be substantially altered to make the building fit for purpose as residential accommodation. If converted, the site could conceivably deliver in excess of 100 units.	
Level of risk of conversion under PD Regime: At present the risk appears low due to the building's design. It would take significant external work to make the building fit for residential use. However, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.	



Image 3 Epsom Gateway, Ashley Avenue: this building provides modern office accommodation, for two significant local employers, in a highly sustainable central location. Conversion to residential appears unlikely. However, recent evidence from schemes that have come forward through the permitted development regime suggests that it could still be at risk. The government's proposal to expand the permitted development regime to include alterations and even demolition suggest that this site merits consideration for an Article 4 Direction.

Site 4

Site Address: Parkside House Ashley Avenue Epsom	Marketing Details: (if applicable) CBRE
Proximity to Station: About 550m Proximity to Public Transport:	Number of on-site parking spaces: 188
Length of time vacant/ subject to marketing Partially occupied by Aon. 2 nd Floor currently available (approx. 11,728 sq ft).	
Size of Building/ site area: Total Rentable Building Area: 34,454 sq ft. Typical Floor Size: 11,515 sq ft. Total Site size approx. 3,500 sq m	
Condition of Building: Good. The building has a Co-Star rating of 3. The building was built in 1990 and benefits from air conditioning; fully accessible raised floors; suspended ceilings with Category II lighting; lifts. Externally it appears in good condition.	
Employment/ Commercial Potential: High. This site is in a Town Centre location and close to public transport. It is partially occupied and the building is in good condition.	
Potential for Conversion into Residential and possible yield: High. The building's setting away from the highway and its external design appear to lend themselves to residential conversion. There may be some external works required. If converted, the site could conceivably yield around 50 units.	
Level of risk of conversion under PD Regime: High. The building's setting away from the highway and its external design appear to lend themselves to residential conversion. There may be some external works required but it would appear these would be minimal and the Council would struggle to resist this building's loss to residential use. Similarly, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.	



Image 4 Parkside House, Ashley Avenue: this building provides modern office accommodation in a highly sustainable central location. Conversion to residential appears likely given its setting and the apparent flexibility of the building's design. This sustainable office building remains a viable employment site and merits consideration for an Article 4 Direction to protect it from loss through the permitted development regime to residential uses.

Site 5

Site Address: Ebbisham House 30 Church Street Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 950m Proximity to Public Transport: About 640m to bus stop on High Street	Number of on-site parking spaces: 20-25
Length of time vacant/ subject to marketing N/A – Occupied by National Counties Building Society	
Size of Building/ site area: Total Rentable Building Area: 12,110 sq ft. Typical Floor Size: 5,865 sq ft. Total Site size approx.1,900 sq m.	
Condition of Building: Good. The building has a Co-Star rating of 2. Externally the building appears in good condition.	
Employment/ Commercial Potential: High – the building is fully occupied despite being in a more peripheral location outside the Town Centre.	
Potential for Conversion into Residential and possible yield: High. The design, setting and location of the building all lend themselves to residential use.	
Level of risk of conversion under PD Regime: Zero. This is a Grade II* Listed Building and therefore cannot be converted under the PD Regime.	



Image 5 Ebbisham House, Church Street: this building provides good quality office accommodation. It continues to provide viable employment floorspace. As a Grade II* Listed Building it is not at risk of loss to residential through the permitted development regime.

Site 6

Site Address: The Kirkgate Church Street Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 550m Proximity to Public Transport: About 230m to bus stop on High Street	Number of on-site parking spaces: Underground parking available – 92 spaces
Length of time vacant/ subject to marketing N/A – occupied by multiple employers including TNS and Kantar Retail.	
Size of Building/ site area: Total Rentable Building Area: 26,713 sq ft. Typical Floor Size: 6,678 sq ft. Total site size approx. 1,400 sq m.	
Condition of Building: Good. The building has a Co-Star rating of 4. Externally the building appears in good condition.	
Employment/ Commercial Potential: High – the building is occupied and is in a highly sustainable Town Centre location.	
Potential for Conversion into Residential and possible yield: High – the design of the building lends itself to conversion with limited external works needed. If converted to residential use, the site could conceivably yield around 20 units.	
Level of risk of conversion under PD Regime: Very High – there is known to be interest in converting this building to residential use using the Permitted Development regime. The building's design lends itself to conversion with little or no external work required. If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.	



Image 6 The Kirkgate, Church Street: this building provides modern office accommodation, for a number of notable local employers, in a highly sustainable central location. It is fully occupied and remains a viable source of employment floorspace. It merits consideration for an Article 4 Direction to protect it from loss through the permitted development regime to residential uses.

Site 7

Site Address: The Wells Church Street Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 500m Proximity to Public Transport: About 180m to bus stop on High Street	Number of on-site parking spaces: Basement level parking at rear.
Length of time vacant/ subject to marketing The building is currently fully occupied by Atkins.	
Size of Building/ site area: Total Rentable Building Area: 20,138 sq ft. Typical Floor Size: 6,712 sq ft. Total site size approx. 1,200 sq m.	
Condition of Building: Good. The building has a Co-Star rating of 4. Externally the building appears in fairly good condition.	
Employment/ Commercial Potential: High – the building is currently fully occupied in a highly sustainable Town Centre location.	
Potential for Conversion into Residential and possible yield: Medium-High. The ground floor does not appear conducive to conversion as currently constituted, but there is higher potential for the upper storeys. If converted the building could conceivably yield around 15 units.	
Level of risk of conversion under new PD Regime: Medium-High. Although some external works would be required to reconfigure the ground floor, the rest of the building lends itself to conversion. The building has been sold fairly recently and was advertised as having residential potential through the Permitted Development route. It would be difficult for the Council to resist the loss of this site if a Prior Approval were granted for the change of use. If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.	



Image 7 The Wells, Church Street: this building provides modern office accommodation, for a notable local employer, in a highly sustainable central location. It is fully occupied and remains a viable source of employment floorspace. It merits consideration for an Article 4 Direction to protect it from loss through the permitted development regime to residential uses.

Site 8

Site Address: Horizon House 28 Upper High Street Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 550m Proximity to Public Transport: Approx. 250m to bus stop on High Street	Number of on-site parking spaces: 59
Length of time vacant/ subject to marketing N/A – appears to be fully occupied.	
Size of Building/ site area: Total Rentable Building Area: 17,992 sq. ft. Typical Floor Size: 4,480 sq. ft. Total site size 800 sq m.	
Condition of Building: Fair. The building was built in 1993 and has a Co-Star rating of 3.	
Employment/ Commercial Potential: High – the building appears fully occupied and is in a highly sustainable Town Centre location.	
Potential for Conversion into Residential and possible yield: Medium – the design of the building as it exists does not easily lend itself to conversion, but it may be possible with minimal external alterations. If converted, the site could conceivably yield around 10-15 units.	
Level of risk of conversion under PD Regime: Medium. Although the building's design does not appear to lend itself to easy conversion it may be possible with minimal external alterations. If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.	



Image 8 Horizon House, Upper High Street: this building provides modern office accommodation in a sustainable central location. It is fully occupied. Conversion to residential appears likely given its setting and the apparent flexibility of the building's design. This sustainable office building remains a viable employment site and merits consideration for an Article 4 Direction to protect it from loss through the permitted development regime to residential uses.

Site 9

Site Address: 30 – 38 Upper High Street Epsom	Marketing Details: (if applicable) Stiles Harold Williams
Proximity to Station: About 600m Proximity to Public Transport: About 290m to bus stop on High Street	Number of on-site parking spaces: 34
Length of time vacant/ subject to marketing The building is partially occupied by A-Plan Insurance on the ground floor. One part of the ground floor is undergoing refurbishment and the upper floors are currently unoccupied but believed to be under offer.	
Size of Building/ site area: Total Rentable Building Area: 11,720 sq ft. Typical Floor Size: 5,625 sq ft. Total site size: 600 sq m	
Condition of Building: The building is in good condition and is currently undergoing partial refurbishment. It currently has a Co-Star rating of 4.	
Employment/ Commercial Potential: High – The site is partially occupied and is undergoing partial refurbishment. It is in a sustainable Town Centre location.	
Potential for Conversion into Residential and possible yield: Whilst it appears possible to convert the building as it currently exists, external works may be required to make the building suitable for residential use. If converted the building could conceivably yield between 5 and 10 units.	
Level of risk of conversion under PD Regime: Medium. Some external works may be required to convert the building to residential use. It is also likely that the ground floor occupier constitutes an A2 rather than B1(a) use, meaning that the building could not be converted in its entirety using the Permitted Development Regime. If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.	



Image 9 30 – 38 Upper High Street: this building provides modern office accommodation in a sustainable central location. It is fully occupied. Conversion to residential appears likely given its setting and the apparent flexibility of the building’s design. This sustainable office building remains a viable employment site and merits consideration for an Article 4 Direction to protect it from loss through the permitted development regime to residential uses.

Site 10

Site Address: Adelphi Court 1 – 3 East Street Epsom	Marketing Details: (if applicable) Instant Offices
Proximity to Station: About 339 metres Proximity to Public Transport: About 100 metres to nearest bus stop on High Street	Number of on-site parking spaces: Very small number of spaces to the rear of the property (1 - 2 spaces).
Length of time vacant/ subject to marketing: The building is marketed as managed workspace by Instant Offices.	
Size of Building/ site area: Total Rentable Building Area: 5,428 sq ft. Typical Floor Size: 1,466 sq ft. Total site area: 260 sq m	
Condition of Building: Externally, the building appears to be in good and solid condition. The building is distinctive being brick clad, with accommodation over three storeys, inclusive of accommodation in its mansard roof space. The internal condition and layout of the building is unknown. However, it is understood that the ground floor is comprised of a central corridor that leads to a stairwell and lift at the rear end of the building. The building has a Co Star rating of 3.	
Employment/ Commercial Potential: The building appears to be a good well-maintained condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace. Given the building's location and close proximity to rail and public transport opportunities and to the facilities and service available within the Town Centre, this is considered an ideal location for office and other commercial uses.	
Potential for Conversion into Residential and possible yield: High – The building lends itself to easy conversion without the need for external works. If converted, the building could conceivably yield between 5 and 8 units.	
Level of risk of conversion under PD Regime: High. The building's design lends itself to internal conversion to residential use with limited or no external works. The Council has already placed an Article 4 Direction on this site to prevent it being converted via the PD Regime. Currently the HSE major hazard site safeguarding zone partially covers this site, which restricts Permitted Development rights.	



Image 10 Adelphi Court, East Street: this building provides flexible serviced office accommodation for smaller businesses. It was assessed as being a valuable asset that merited protection through an Article 4 Direction by the previous Study. It is currently fully occupied and remains a viable source of employment floorspace. It and merits consideration for a new Article 4 Direction to protect it from loss through the permitted development regime to residential uses.

Site 11

Site Address: Epsom Chase 1 Hook Road Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 500m Proximity to Public Transport: About 180m to bus stop on High Street	Number of on-site parking spaces: Unknown – underground and surface parking on site
Length of time vacant/ subject to marketing N/A – the building is fully occupied by Bunzl.	
Size of Building/ site area: Total Rentable Building Area: 15,393 sq ft. Typical Floor Size: 7,696 sq ft. Total site size: 1,700 sq m	
Condition of Building: Good. The building appears in good physical condition. It has a Co-Star rating of 3.	
Employment/ Commercial Potential: High. The building is fully occupied and the site is in a highly sustainable Town Centre location.	
Potential for Conversion into Residential and possible yield: High – The building’s design lends itself to residential conversion with little or no external works required. If converted the building could conceivably yield at least 20 units.	
Level of risk of conversion under PD Regime: High – The building appears to lend itself to easy conversion with minimal external works required. There would be little chance of preventing the loss of this site if a Prior Approval application were made. Similarly, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use. However, currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.	



Image 11 Epsom Chase, Hook Road: this building provides modern office accommodation, for a notable local employer, in a highly sustainable central location. It is fully occupied and remains a viable source of employment floorspace. It has been assessed as being at high risk of loss through conversion due to the flexibility of the building's design. It merits consideration for an Article 4 Direction.

Site 12

Site Address: Sollis House 20 Hook Road Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 550m Proximity to Public Transport: About 250m to bus stop on High Street	Number of on-site parking spaces: 10
Length of time vacant/ subject to marketing N/A – site is fully occupied by The Sollis Partnership	
Size of Building/ site area: Site area: 350 sq m	
Condition of Building: The building appears in good condition. Its Co Star rating is unknown.	
Employment/ Commercial Potential: High – The building is fully occupied and is in a sustainable Town Centre location.	
Potential for Conversion into Residential and possible yield: High – The building appears to lend itself to reasonably easy conversion requiring limited or no external works. If converted this site could conceivably yield between 1 and 5 units.	
Level of risk of conversion under PD Regime: High – the building's design appears to lend itself to easy conversion with limited or no external works. It could even conceivably come forward as a single residential unit. Similarly, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use. However, currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.	



Image 12 Sollis House, Hook Road: this building provides modern office accommodation, for a notable local employer, in a highly sustainable central location. It is occupied and remains a viable source of employment floorspace. It has been assessed as being at high risk of loss through conversion due to the flexibility of the building's design. It merits consideration for an Article 4 Direction.

Site 13

Site Address: Emerald House East Street Epsom	Marketing Details: (if applicable) Stiles Harold Williams
Proximity to Station: About 400 metres Proximity to Public Transport: About 175 metres to nearest bus stop (on southern side of East Street)	Number of on-site parking spaces: Parking to the rear accessed from the side of the building. Parking comprised of provision at surface, undercroft and basement level. 55 car parking spaces.
Length of time vacant/ subject to marketing: The building is currently vacant and has been for some 2 years. It is being actively marketed as office accommodation.	
Size of Building/ site area: Total Rentable Building Area: 17,245 sq ft. Typical Floor Size: 5,481 sq ft. Total site area: 1,000 sq m	
Condition of Building: Externally, the building appears to be a modern office in very good and solid condition. The building is brick clad, with accommodation over three - four storeys. The internal condition and layout of the building is unknown. The building is noted as having an energy performance rating of E, raised floors, one passenger lift and air condition. It has a Co Star rating of 3.	
Employment/ Commercial Potential: The building appears to be modern and in a good well-maintained condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace.	
Potential for Conversion into Residential and possible yield: There has been no interest from the market in converting the building to residential. Conversion to a purely residential use may be possible but is likely to require and external works. For example works to the buildings fenestration may be required to provide it with a residential appearance. If converted, the building could conceivably yield around 30 units.	

Level of risk of conversion under PD Regime:

Medium. The building's design does not readily lend itself to straightforward conversion and would require external works. However, if a Prior Approval application were granted the Council would struggle to prevent its loss to residential use.

If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.

Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.



Image 13 Emerald House, East Street: this building provides modern quality office accommodation in a highly sustainable central location. Although this building has been vacant since 2013 there has to date been interest in its conversion. However, its central location and the availability of on-site parking provision make it an ideal candidate for conversion. Consequently, it merits consideration for an Article 4 Direction.

Site 14

Site Address: Bradford House 39A East Street Epsom	Marketing Details: (if applicable) Stiles Harold Williams
Proximity to Station: About 500 metres. Proximity to Public Transport: About 140 metres to bus stop on northern side of East Street	Number of on-site parking spaces: Located to side and rear of building. 20 car parking spaces.
Length of time vacant/ subject to marketing: Building is currently vacant, having been unoccupied for about three years.	
Size of Building/ site area: Total area – 730 sq m (7,840 sq ft)	
Condition of Building: Externally, the building appears to be in good, albeit ageing condition. Some external features, such as fenestration suggest that modernisation/ refurbishment may be required. However, the building is in a pleasant setting being surrounded by mature planting and landscaping. The internal condition of the building is unknown. The building is noted as having accommodation over four floors, an energy performance rating of B, raised flooring and a security system.	
Employment/ Commercial Potential: The building is ageing and its condition may well be deteriorating due to continued vacancy. However, on the basis of its external condition it still appears solid and fit-for commercial occupation. It may not be suitable as Grade A office stock but may still be able to provide accommodation for other commercial activities. The site has planning permission together with the adjacent Crossways House to come forward as a mixed-use development, with commercial uses at ground floor level and associated residential accommodation located on the upper floors. The redevelopment of Crossways House is already being undertaken.	
Potential for Conversion into Residential and possible yield: The site has planning permission together with the adjacent Crossways House to come forward as a mixed-use development, with commercial uses at ground floor level and associated residential accommodation located on the upper floors. The redevelopment of Crossways House is already being undertaken.	
Level of risk of conversion under PD Regime: High. The Council has already placed an Article 4 Direction on this site to prevent it being converted via the PD Regime. Whilst the redevelopment of the building has not yet been carried out this Article 4 Direction is still in effect. However, currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.	



Image 14 Bradford House, East Street: It was assessed as being a valuable employment site that merited protection through an Article 4 Direction by the previous Study. The building is currently vacant and forms part of wider permitted proposal to develop it and the adjoin Crossways House (which is also the subject of a historic Article 4 Direction) into student accommodation (a C1 use class). In spite of the permitted proposal it merits consideration for a new Article 4 Direction so that the Borough Council retains the ability to manage development on this part of East Street.

Site 15

Site Address: Newplan House 41 East Street Epsom	Marketing Details: (if applicable) Stiles Harold Williams
Proximity to Station: About 510 metres Proximity to Public Transport: About 130 metres to bus stop on northern side of East Street	Number of on-site parking spaces: Located to side and rear of building. 62 car parking spaces.
Length of time vacant/ subject to marketing: The building is partially occupied and only the third floor is currently available to let (5,730 sq ft).	
Size of Building/ site area: Total Rentable Building Area: 23,060 sq ft. Typical Floor Size: 5,765 sq ft. Total site size: 850 sq m	
Condition of Building: The building is modern stock in good condition. Accommodation is laid out over four storeys. The building is noted as having an energy rating of E, two passenger lifts, air conditioning and a security system. The building has a Co Star rating of 3.	
Employment/ Commercial Potential: The building is modern and in good condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace.	
Potential for Conversion into Residential and possible yield: The design of the building does not appear to readily lend itself to any easy conversion to residential use. Conversion to a residential use may be possible but is likely to require significant external works. If converted, the building could conceivably yield about 30-40 units.	
Level of risk of conversion under PD Regime: Medium. Although this building would require significant external works to be converted to residential use, the Council may struggle to prevent its loss if a Prior Approval application were made and subsequent planning applications were then submitted once Prior Approval was obtained to approve the external works. If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use. However, currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.	



Image 15 Newplan House, East Street: this building provides modern office accommodation, for two significant local employers, in a highly sustainable central location. Conversion to residential appears unlikely. However, recent evidence from schemes that have come forward through the permitted development regime suggests that it could still be at risk. The government's proposal to expand the permitted development regime to include alterations and even demolition suggest that this site merits consideration for an Article 4 Direction.

Site 16

Site Address: Nightingale House 46 – 48 East Street Epsom	Marketing Details: (if applicable) None
Proximity to Station: About 560 metres Proximity to Public Transport: Bus stop immediately outside	Number of on-site parking spaces: Rear parking accessed from side of building, via neighbouring Job Centre car park.
Length of time vacant/ subject to marketing: Building is currently occupied in its entirety by four employers.	
Size of Building/ site area: Total Rentable Building Area: 3,247 sq ft. Typical Floor Size: 811 sq ft. Total site area: 125 sq m	
Condition of Building: Externally, the building appears to be a modern office in good and solid condition. The building is brick clad, with accommodation over three storeys. The internal condition and layout of the building is unknown.	
Employment/ Commercial Potential: The building appears to be modern and in good condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace.	
Potential for Conversion into Residential and possible yield: There has been no interest from the market in converting the building to residential. Conversion to a purely residential use may be possible but is likely to require internal and external works, which will require planning permission. Access to the on-site parking provision is via the neighbouring office block's car park and presents an obstacle to conversion, which will require the neighbour's agreement to achieve a resolution. If converted, the scheme could potentially yield around 5-10 units.	
Level of risk of conversion under PD Regime: Medium. The building's design does not readily lend itself to straightforward conversion and would require external works. However, if a Prior Approval application were granted the Council would struggle to prevent its loss to residential use. If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use. Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.	



Image 16 Nightingale House, East Street: this building provides modern office accommodation, for four local employers, in a sustainable central location. Conversion to residential appears unlikely. However, recent evidence from schemes that have come forward through the permitted development regime suggests that it could still be at risk. The government's proposal to expand the permitted development regime to include alterations and even demolition suggest that this site merits consideration for an Article 4 Direction.

Site Address: Colevin Interiors 42 – 44 East Street Epsom	Marketing Details: (if applicable) Ground floor available to let via Colevin Interiors (landowner)
Proximity to Station: About 560 metres Proximity to Public Transport: Bus stop immediately outside	Number of on-site parking spaces: None
Length of time vacant/ subject to marketing: Building is currently part occupied by Colevin Interiors with the ground floor available to let.	
Size of Building/ site area: Total Rentable Building Area: 1,419 sq ft. Total site area: 125 sq m	
Condition of Building: Externally, the building appears to be a very well maintained office converted from a former residential property. The building appears to be historic and has a distinctive character, in an area that is otherwise characterised by modern office buildings. The internal condition and layout of the building is unknown. The building's Co Star rating is unknown.	
Employment/ Commercial Potential: The building appears to be well-maintained and in good condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace.	
Potential for Conversion into Residential and possible yield: There has been no interest from the market in converting the building to residential. However, conversion back to a residential use would appear to be relatively straightforward as externally the building remains in a residential configuration. The lack of on-site parking provision may render conversion unattractive. If converted, this build could potentially yield 1-4 units.	
Level of risk of conversion under PD Regime: Zero. Although the building's design lends itself to a straightforward internal conversion, this is a Grade II Listed Building. Consequently it does not benefit from Permitted Development Rights to convert from office to residential use. Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.	



Image 16 Colevin Interiors, East Street: this modest office building continues to provide viable employment floorspace. As a Grade II Listed Building it is not at risk of loss to residential through the permitted development regime.

Site 17

Site Address: Job Centre 50 East Street Epsom	Marketing Details: (if applicable) None
Proximity to Station: About 570 metres. Proximity to Public Transport: Bus stop immediately outside.	Number of on-site parking spaces: Rear parking accessed from front of building – approximately 25 to 30 spaces.
Length of time vacant/ subject to marketing: Building is currently occupied in its entirety by a single employer.	
Size of Building/ site area: Total Rentable Building Area: 8,460 sq ft. Typical Floor Size: 2,115 sq ft. Total site area: 410 sq m	
Condition of Building: Fair. Externally, the building appears to be in good and solid, albeit ageing condition. The building is brick clad, with accommodation over three storeys. The internal condition and layout of the building is unknown, although the design and placement of its fenestration suggests large open plan office layouts. The building has a Co Star rating of 2.	
Employment/ Commercial Potential: The building is relatively modern and appears to be in good albeit ageing condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace.	
Potential for Conversion into Residential and possible yield: There has been tentative interest from the market in potentially converting the building to residential use. Conversion to a purely residential use may be possible but is likely to require significant external works, which will require planning permission. For example works to the buildings fenestration may be required to provide it with a residential appearance and to make best use of the internal floorspace. If converted, the building could conceivably yield 20-25 units.	

Level of risk of conversion under PD Regime:

Low. The building's design does not readily lend itself to straightforward conversion and would require external works.

As the building is occupied by a Job Centre, the lawful use of the building falls under the A2 (financial and professional services) use class. As an A2 use, the Prior Approval route could still be sought to convert the building to residential use under Class M of the General Permitted Development Order 2015. However, this would be a more onerous process for a developer than the Prior Approval mechanism for the conversion of B1(a) office use to residential, as the Council would have to assess the impact of the proposal on adequate provision of services in the area.

Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.



Image 17 Job Centre, East Street: the building is relatively modern and appears to be in good albeit ageing condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace. Recent intelligence indicates that the building may soon become available to the market. As an A2 use, any conversion of the Job Centre to residential use would need to take a more onerous route under Class M of the General Permitted Development Order 2015.

Site 18

Site Address: Eastleigh House 52 - 60 East Street Epsom	Marketing Details: (if applicable) None
Proximity to Station: About 614 metres. Proximity to Public Transport: About 52 metres to bus stop on southern side of East Street	Number of on-site parking spaces: Rear parking accessed from front of building.
Length of time vacant/ subject to marketing: Building is currently occupied in its entirety by Premium Credit.	
Size of Building/ site area: Total Rentable Building Area: 23,310 sq ft. Typical Floor Size: 5,827 sq ft. Total site area: 750 sq m	
Condition of Building: Externally, the building appears to be in fair and solid condition. The building is brick clad, with accommodation over four storeys – inclusive of accommodation in a mansard roofspace. The internal condition and layout of the building is unknown. The building has a Co Star rating of 2.	
Employment/ Commercial Potential: The building is modern and in fair condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace.	
Potential for Conversion into Residential and possible yield: There has been no interest from the market in converting the building to residential. Conversion to a purely residential use may be possible but is likely to require significant internal and external works, which will require planning permission. For example works to the buildings fenestration may be required to provide it with a residential appearance. If converted, the building could conceivably yield around 50 units.	

Level of risk of conversion under PD Regime:

Medium. The building's design does not readily lend itself to straightforward conversion and would require external works. However, if a Prior Approval application were granted the Council would struggle to prevent its loss to residential use.

If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.

Given the age of the building and its continued employment use, it can be safely assumed that it remains a viable employment site. Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.



Image 18 Eastleigh House, East Street: this building provides modern office accommodation, for a major local employer, in a sustainable central location. Conversion to residential appears unlikely. However, recent evidence from schemes that have come forward through the permitted development regime suggests that it could still be at risk. The government's proposal to expand the permitted development regime to include alterations and even demolition suggest that this site merits consideration for an Article 4 Direction.

Site 19

Site Address: Towers Watson 64 – 74 East Street Epsom	Marketing Details: (if applicable) 70Seventy (www.seventyepsom.co.uk)
Proximity to Station: About 664 metres Proximity to Public Transport: About 65 metres to bus stop on southern side of East Street	Number of on-site parking spaces: Rear parking accessed from side of building. 80 parking spaces on site.
Length of time vacant/ subject to marketing: Building is currently vacant but has undergone a recent substantial refurbishment and is being marketed as office accommodation.	
Size of Building/ site area: Total Rentable Building Area: 16,454 sq ft. Typical Floor Size: 4,113 sq ft. Total site area: 640 sq m	
Condition of Building: Externally, the building appears to be a modern Grade A office in good and solid condition. The building is brick clad, with accommodation over four storeys – inclusive of accommodation in the roofspace. The building has recently undergone extensive refurbishment and is being marketed for office use. Its current Co Star rating is unknown.	
Employment/ Commercial Potential: The building is modern and in very good condition. There is no evidence to suggest that it is no longer fit-for-purpose and as such it remains viable employment floorspace.	
Potential for Conversion into Residential and possible yield: There has been no interest from the market in converting the building to residential. Conversion to a purely residential use may be possible but is likely to require significant internal and external works, which will require planning permission. For example it would appear that additional fenestration would be required to make the best use of the internal space. The building follows an open plan layout internally and its subdivision would result in the need for more windows. If converted the building could potentially yield approximately 30 units.	
Level of risk of conversion under PD Regime: Low. The building's design does not readily lend itself to a straightforward internal conversion through the permitted development process and will require planning permission. Given that the building has undergone a recent refurbishment and is being actively marketed for employment use, it can be safely assumed that it remains a viable employment site. Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.	



Image 19 Towers Watson, East Street: this vacant office building has recently been refurbished to provide good quality accommodation and is actively being marketed as such. On that basis it would be unsound business practise for the landowner to pursue seek a change to residential uses through the permitted development regime at this point in time. On that basis it is considered that the building would not currently benefit from an Article 4 Direction.

Site 20

Site Address: Epsom Point 84 – 90 East Street Epsom	Marketing Details: (if applicable) None
Proximity to Station: About 686 metres Proximity to Public Transport: About 93metres to bus stop on southern side of East Street	Number of on-site parking spaces: Basement level parking accessed from side of building. 26 parking spaces on site.
Length of time vacant/ subject to marketing: Building is currently vacant, having been unoccupied for a period of about two – three years. The building was previously occupied by the County and Magistrates' Courts. These uses were consolidated to larger sites at Guildford and Kingston. Whilst the building is unoccupied it is not being actively marketed.	
Size of Building/ site area: Total Rentable Building Area: 7,273 sq ft. Total site area: 540 sq m	
Condition of Building: Externally, the building appears to be in fair and solid condition. The building is distinctive being brick clad, with accommodation over three storeys. The internal condition and layout of the building is unknown. The building has a Co Star rating of 2.	
Employment/ Commercial Potential: The building is ageing and its condition is deteriorating due to continued vacancy. The building structure appears to be solid and there is no evidence to suggest that it is no longer fit-for-purpose as office accommodation. The availability of on-site parking makes this an attractive option. However, the building's internal layout is unknown; it is possible that reconfiguration of court rooms will be required and that this may render its return to commercial use unviable.	
Potential for Conversion into Residential and possible yield: There has been no interest from the market in converting the building to residential. Conversion to a purely residential use may be possible but is likely to require significant internal and external works, which will require planning permission. If converted to residential this building could yield about 18-25 units. An alternative student scheme could yield up to 80 student beds.	
Level of risk of conversion under PD Regime: Low. The building's condition and design does not readily lend itself to a straightforward internal conversion through the permitted development process and will require planning permission. As a former Court, the site does not fall under B1(a) office use but is classified as Sui Generis. This means that any conversion would require planning permission.	



Image 20 Epsom Point, East Street: the Study notes that this building is aging and is deteriorating due to continued vacancy. The building structure appears to be solid and there is no evidence to suggest that it is no longer fit-for-purpose as office accommodation. The availability of on-site parking makes this an attractive opportunity. The established use of the site is a County/ Magistrates' Court and such it falls within the Sui Generis use class. Consequently, it is not at risk of being lost to residential uses through the Permitted Development Regime.

Site 21

Site Address: Glen House 100 East Street Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 860m Proximity to Public Transport: About 100m to bus stop on East Street	Number of on-site parking spaces: Parking at rear of the site. 6 parking spaces available.
Length of time vacant/ subject to marketing: N/A – Occupied by Harbord & Co Solicitors	
Size of Building/ site area: Total Rentable Building Area: 2,480 sq ft. Typical Floor Size: 800 sq ft. Total site area: 240 sq m	
Condition of Building: Externally the building appears to be in fair albeit ageing condition. The building has a Co Star rating of 2.	
Employment/ Commercial Potential: As an occupied site, it can be assumed that it remains a viable employment location for a small or medium sized business.	
Potential for Conversion into Residential and possible yield: High. The building adjoins an existing residential block which has the same design, indicating its potential for conversion with little or no external works. As a small office building in a more peripheral location than the prominent office stock along East Street the site could struggle to attract new tenants if vacated.	
Level of risk of conversion under PD Regime: Unknown. As the building is occupied by a Solicitors, the lawful use of the building could be either A2 (financial and professional services) or B1(a) office. This would need to be established before a Prior Approval application could be considered. The lawful use of the building is unknown at this point. If it were considered to be in A2 use, the Prior Approval route could still be sought to convert the building to residential use under Class M of the General Permitted Development Order 2015. However, this would be a more onerous process for a developer than the Prior Approval mechanism for the conversion of B1(a) office use to residential, as the Council would have to assess the impact of the proposal on adequate provision of services in the area.	



Image 21 Glen House, East Street: as an occupied site, it is assumed that it remains a viable employment location for a small or medium sized business. The level of risk is potentially very high as the building would appear to require little in the way of external works to convert into residential accommodation. However, there is some uncertainty over the established lawful use of the building. Should the building fall under the A2 use class conversion to residential accommodation will not be possible through the Permitted Development Regime.

Site 22

Site Address: 69 – 71 East Street Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 850m Proximity to Public Transport: About 100m to bus stop on East Street	Number of on-site parking spaces:
Length of time vacant/ subject to marketing N/A – Occupied by Hakim Fry Chartered Accountants	
Size of Building/ site area: Site area: Approx. 300 sq m	
Condition of Building: Externally the building appears to be in a fair condition. It is currently fully occupied and as such remains a viable employment site.	
Employment/ Commercial Potential: High – The building is fully occupied. Although it is towards the far end of East Street it is still close to public transport. The building is currently occupied by a firm of chartered accountants and this type of use continues to be suitable for the building's size and location.	
Potential for Conversion into Residential and possible yield: Medium-High – it appears possible to convert the building with little or no external works required. If converted, this site could conceivably yield 4-5 units.	
Level of risk of conversion under PD Regime: Unknown. As the building is occupied by a Chartered Accountants, the lawful use of the building could be either A2 (financial and professional services) or B1(a) office. This would need to be established before a Prior Approval application could be considered. The lawful use of the building is unknown at this point. If it were considered to be in A2 use, the Prior Approval route could still be sought to convert the building to residential use under Class M of the General Permitted Development Order 2015. However, this would be a more onerous process for a developer than the Prior Approval mechanism for the conversion of B1(a) office use to residential, as the Council would have to assess the impact of the proposal on adequate provision of services in the area.	

Site 23

Site Address: Victoria House 73-77 East Street Epsom	Marketing Details: (if applicable) N/A
Proximity to Station: About 850m Proximity to Public Transport: About 125m to bus stop on East Street	Number of on-site parking spaces: 8
Length of time vacant/ subject to marketing N/A – building is occupied by the Core Wellness Centre.	
Size of Building/ site area: Total Rentable Building Area: 3,850 sq ft. Typical Floor Size: 1,925 sq ft. Total site size: 400 sq m	
Condition of Building: Fair – The building has a Co-Star rating of 2. Externally the building appears in reasonable condition.	
Employment/ Commercial Potential: High – The building is fully occupied. Although it is towards the far end of East Street it is still close to public transport. The building is occupied by a D1 user and this type of use continues to be suitable for the building's size and location.	
Potential for Conversion into Residential and possible yield: Medium-High. The building appears convertible with limited or no external works required. If converted, this site could potentially yield 10-15 units.	
Level of risk of conversion under PD Regime: Low. The building is occupied by a D1 user. Consequently it is highly likely that the lawful use of the building does not fall into B1(a) office use and therefore there is no Permitted Development Right to convert to residential use.	



Image 23 Victoria House, East Street: the building appears to be in good condition, and is currently occupied. On that basis it is considered to be viable as employment floorspace. The building has the potential to be converted to residential accommodation. However, the current occupier utilises the building under the D1use class. Consequently, conversion to residential accommodation will not be possible through the Permitted Development Regime.

7. Conclusions

7.1 The Study identified the following conclusions:

- The original Article 4 Directions served on Adelphi Court, Bradford House and Crossways House has been successful in managing proposals to change the use of these important office/ employment sites. Adelphi Court remains a viable, fully occupied office building. Bradford House although currently unoccupied remains available to the market and could still come forward for employment uses. Proposals to change the use of Crossways House to a mixed use scheme comprised of student accommodation (C1 use class) and commercial floorspace were positively considered by the Council. That proposal is currently being implemented.
- The serving of new Article 4 Directions on viable office buildings/ sites, located in or around Epsom Town Centre, that have been assessed as being at risk is considered to be an appropriate intervention to help manage change. Such an intervention will help ensure that the Borough Council can continue to implement a strategy for sustainable growth.
- The Town Centre remains a highly sustainable location to do business and for new employers to locate. This is evidenced by the viability and quality of the office stock surveyed by the Study and the levels of occupancy.
- Since the implementation of the original changes to the Permitted Development Regime, Epsom Town Centre has witnessed the loss of a number of notable quality office buildings, which could have continued to provide viable employment floorspace. This is contrary to the stated objectives behind the changes to the Permitted Development Regime, which sought the release of older stock no longer fit-for-purpose. There are strong indications that this trend will continue.
- The new residential accommodation yielded by the conversion of lost office space has not met local needs. In the main, the new residential accommodation has been high value – which is a contributing factor in the rise in local house prices, which are making the Borough a less affordable place to live.
- The loss of office buildings to residential accommodation has resulted in a reduction in revenue from business rates.

- The further proposed changes being introduced through the Housing and Planning Bill to extend and expand Permitted Development Rights pose a significant risk to Epsom Town Centre's remaining office stock. A worst-case scenario envisages the loss of most of our remaining stock within the next five years. This would result in the majority of current employers based in the Town Centre leaving the Borough, because there are no alternative sites available. This would have a significant impact upon the medium-long term vitality and viability of the Town Centre as a retail and commercial location. It would also have an adverse impact upon the Borough Council's strategy for sustainable growth and would undermine the infrastructure investment being directed at Epsom Town Centre and the Longmead and Nonsuch employment areas³.
- Epsom Town Centre's remaining office stock is relatively diverse in terms of size, age and overall quality. The majority of the stock surveyed for the Study was assessed as being viable, with a proportion being either Grade A or of good quality.
- The Town Centre is a highly accessible and sustainable location for office and other employment activities being well located in relation the railway station, public transport and other transport networks.
- Whilst the HSE major hazard site safeguarding zone, centred upon the Utilities site on East Street, currently provides a degree of protection to many of the remaining office buildings in that locality, it cannot be relied upon as a long term intervention. The decommissioning of the gas holders and potential relocation of the utility provider (Scotia Gas) suggest that at the very least the extent of the zone may be reduced to cover a smaller area⁴. On that basis, the Study advises that precautionary action be taken to ensure that those buildings/ sites at potential risk benefit from Article 4 Directions.
- A small number of the office buildings surveyed as part of the Study fall within other use classes – such as A2 Financial and Professional Services and D1 Non-residential Institutional uses. For those buildings in A2 use the Prior Approval route could still be sought to convert the building to residential use under Class M of the General Permitted Development Order 2015. However, this would be a more onerous process for a developer than the Prior Approval mechanism for the conversion of B1(a) office use to residential, as the Council would have to assess the impact of the proposal on adequate provision of services in the area. The Council may still decide that these buildings would benefit from Article 4 Directions.

³ This specifically relates to the Kiln Lane Link major scheme. The business case for the Kiln Lane Link is in part predicated upon securing an up-lift in employment opportunities, by improving accessibility). The unmanaged loss of office stock through the Permitted Development Regime would undermine the future viability of such an up-lift; through the loss of the very sites that could be enhanced by that proposal.

⁴ Although the gas holders have been decommissioned, the site continues to function as a major gas distribution utility and it is logical that some form of safeguarding zone will remain.

- Other office buildings in Epsom Town Centre, including examples not surveyed for the purposes of the Study, are included as heritage assets on the statutory National List. There is currently no risk of these being lost to residential uses through the Permitted Development Regime.

7.2 The following table sets out the Study's assessment of risk from conversion for the individual surveyed buildings and sites.

Table 1: Levels of risk from conversion to residential through permitted development

Site	Commentary
High Risk	
Site 1 Oaks House 16 – 22 West Street Epsom	<p>High. Although presently the ground floor does not lend itself to easy conversion there appears to be higher potential for the upper floors to be lost. However, if the principle of conversion were established via the granting of Prior Approval, the Council may struggle to resist the loss of this site.</p> <p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p>
Site 4 Parkside House Ashley Avenue Epsom	<p>High. The building's setting away from the highway and its external design appear to lend themselves to residential conversion. There may be some external works required but it would appear these would be minimal and the Council would struggle to resist this building's loss to residential use.</p> <p>Similarly, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p>
Site 6 The Kirkgate Church Street Epsom	<p>Very High – there is known to be interest in converting this building to residential use using the Permitted Development regime. The building's design lends itself to conversion with little or no external work required.</p> <p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p>
Site 7 The Wells Church Street Epsom	<p>Medium-High. Although some external works would be required to reconfigure the ground floor, the rest of the building lends itself to conversion. The building has been sold fairly recently and was advertised as having residential potential through the Permitted Development route. It would be difficult for the Council to resist the loss of this site if a Prior Approval were granted for the change of use.</p> <p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p>

Site 10 Adelphi Court 1 – 3 East Street Epsom	<p>High. The building's design lends itself to internal conversion to residential use with limited or no external works.</p> <p>The Council has already placed an Article 4 Direction on this site to prevent it being converted via the PD Regime. Currently the HSE major hazard site safeguarding zone partially covers this site, which restricts Permitted Development rights.</p>
Site 11 Epsom Chase 1 Hook Road Epsom	<p>High – The building appears to lend itself to easy conversion with minimal external works required. There would be little chance of preventing the loss of this site if a Prior Approval application were made.</p> <p>Similarly, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p> <p>However, currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
Site 12 Sollis House 20 Hook Road Epsom	<p>High – the building's design appears to lend itself to easy conversion with limited or no external works. It could even conceivably come forward as a single residential unit.</p> <p>Similarly, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p> <p>However, currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
Site 14 Bradford House 39A East Street Epsom	<p>High. The Council has already placed an Article 4 Direction on this site to prevent it being converted via the PD Regime. Whilst the redevelopment of the building has not yet been carried out this Article 4 Direction is still in effect.</p> <p>However, currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
Medium Risk	
Site 2 Global House Ashley Avenue Epsom	<p>At present the risk appears low due to the building's design and access issues. It would take significant external work to make the building fit for residential use.</p> <p>However, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p>
Site 3 Epsom Gateway Ashley Avenue Epsom	<p>At present the risk appears low due to the building's design. It would take significant external work to make the building fit for residential use.</p> <p>However, if the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p>
Site 8 Horizon House 28 Upper High Street Epsom	<p>Medium. Although the building's design does not appear to lend itself to easy conversion it may be possible with minimal external alterations.</p> <p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p>
Site 9 30 – 38 Upper High Street Epsom	<p>Medium. Some external works may be required to convert the building to residential use. It is also likely that the ground floor occupier constitutes an A2 rather than B1(a) use, meaning that the building could not be converted in its entirety using the Permitted Development Regime.</p>

	<p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p>
<p>Site 13 Emerald House East Street Epsom</p>	<p>Medium. The building's design does not readily lend itself to straightforward conversion and would require external works. However, if a Prior Approval application were granted the Council would struggle to prevent its loss to residential use.</p> <p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p> <p>Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
<p>Site 15 Newplan House 41 East Street Epsom</p>	<p>Medium. Although this building would require significant external works to be converted to residential use, the Council may struggle to prevent its loss if a Prior Approval application were made and subsequent planning applications were then submitted once Prior Approval was obtained to approve the external works.</p> <p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p> <p>However, currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
<p>Site 16 Nightingale House 46 – 48 East Street Epsom</p>	<p>Medium. The building's design does not readily lend itself to straightforward conversion and would require external works. However, if a Prior Approval application were granted the Council would struggle to prevent its loss to residential use.</p> <p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p> <p>Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
<p>Site 18 Eastleigh House 52 - 60 East Street Epsom</p>	<p>Medium. The building's design does not readily lend itself to straightforward conversion and would require external works. However, if a Prior Approval application were granted the Council would struggle to prevent its loss to residential use.</p> <p>If the permitted development regime was changed to include external alterations and/or demolition there would appear to be little the Council could do to prevent the loss of this site to residential use.</p> <p>Given the age of the building and its continued employment use, it can be safely assumed that it remains a viable employment site. Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
Low Risk	
<p>Site 5 Ebbisham House 30 Church Street Epsom</p>	<p>Zero. This is a Grade II* Listed Building and therefore cannot be converted under the PD Regime.</p>

Site 16 Colevin Interiors 42 – 44 East Street Epsom	<p>Zero. Although the building's design lends itself to a straightforward internal conversion, this is a Grade II Listed Building. Consequently it does not benefit from Permitted Development Rights to convert from office to residential use.</p> <p>Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
Site 17 Job Centre 50 East Street Epsom	<p>Low. The building's design does not readily lend itself to straightforward conversion and would require external works.</p> <p>As the building is occupied by a Job Centre, the lawful use of the building falls under the A2 (financial and professional services) use class. As an A2 use, the Prior Approval route could still be sought to convert the building to residential use under Class M of the General Permitted Development Order 2015. However, this would be a more onerous process for a developer than the Prior Approval mechanism for the conversion of B1(a) office use to residential, as the Council would have to assess the impact of the proposal on adequate provision of services in the area.</p> <p>Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
Site 19 Towers Watson 64 – 74 East Street Epsom	<p>Low. The building's design does not readily lend itself to a straightforward internal conversion through the permitted development process and will require planning permission. Given that the building has undergone a recent refurbishment and is being actively marketed for employment use, it can be safely assumed that it remains a viable employment site.</p> <p>Currently the HSE major hazard site safeguarding zone covers this site, which restricts Permitted Development rights.</p>
Site 20 Epsom Point 84 – 90 East Street Epsom	<p>Low. The building's condition and design does not readily lend itself to a straightforward internal conversion through the permitted development process and will require planning permission. As a former Court, the site does not fall under B1(a) office use but is classified as Sui Generis. This means that any conversion would require planning permission.</p>
Site 22 69 – 71 East Street Epsom	<p>Unknown. As the building is occupied by a Chartered Accountants, the lawful use of the building could be either A2 (financial and professional services) or B1(a) office. This would need to be established before a Prior Approval application could be considered. The lawful use of the building is unknown at this point.</p> <p>If it were considered to be in A2 use, the Prior Approval route could still be sought to convert the building to residential use under Class M of the General Permitted Development Order 2015. However, this would be a more onerous process for a developer than the Prior Approval mechanism for the conversion of B1(a) office use to residential, as the Council would have to assess the impact of the proposal on adequate provision of services in the area.</p>
Site 23 Victoria House 73-77 East Street Epsom	<p>Low. The building is occupied by a D1 user. Consequently it is highly likely that the lawful use of the building does not fall into B1(a) office use and therefore there is no Permitted Development Right to convert to residential use.</p>

8. Recommendations

8.1 On the basis of the conclusions set out above the following recommendations are suggested to the Council:

- i. That the Council considers the immediate introduction of Article 4 Directions on those office buildings and sites that remain important and viable sources of employment land and are at risk from loss through conversion. These buildings and sites are:
 - Oaks House
 - Parkside House
 - The Kirkgate
 - The Wells
 - Adelphi Court
 - Epsom Chase
 - Sollis House
 - Bradford House
 - Global House
 - Epsom Gateway
 - Horizon House
 - 30 – 38 Upper High Street
 - Emerald House
 - Newplan House
 - Nightingale House
 - Eastleigh House
- ii. That consideration is given to serving additional Article 4 Directions to manage the two sites identified as falling under the A2 use class, namely;
 - The Job Centre, East Street; and
 - 69 – 71 East Street
- iii. That the Council continues to monitor proposals coming through the Permitted Development regime, particularly those buildings and sites not currently included under the proposed Article 4 Directions. Subject to any monitoring outcomes and where it is appropriate the Council should in the future consider options to serve additional Article 4 Directions to include other buildings and sites when it becomes necessary to afford them protection.

- iv. The Council must continue to develop its evidence base in relation to employment uses across the Town Centre. This is particularly important in relation to providing evidence that demonstrates that the reasonable prospect of buildings and sites continuing in employment use⁵.
- v. The Council must continue to work and engage with landowners and their agents to secure the enhancement and regeneration in accordance with local plan policy.

⁵ National planning policy, under NPPF Paragraph 22 sets out the test for affording sites long term protection through local plan policies.

Appendix A: Epsom & Ewell Borough Council – PDCOU Commercial Office Space to Residential Use

Background

Legislation was introduced in May 2013 making it possible to convert office floorspace to residential use without requiring planning permission until the end of May 2016. There are proposals for these to be made permanent.

This permitted development right is subject to prior approval by the local planning authority. The matters for Prior Approval are transport and highways impact on the development; contamination risks on the site; flooding risks on the site.

Within Epsom & Ewell a small designated area on East Street is exempt from the temporary permitted development right under Article 4 Direction. This Direction was made in 2013 in response to the Government's changes to Permitted Development rights and covers three sites that are considered to be of significant strategic importance because of their central location in the town centre. No other commercial sites in the borough benefit from this exemption.

The Impact of Prior Approval for Conversion of Offices to Residential In Epsom & Ewell

The schedule accompanying this report sets out details of all of the applications for prior approval to convert office floorspace to residential use. The rest of this note provides a brief commentary on the data.

a) Scheme Detail

From 31st May 2013 to 31st October 2015 (29 months) a total of 20 prior approval applications have been permitted totalling at least 100 units. Seventeen schemes are in Epsom town centre; three in Ewell and one in Woodcote.

Of the approved units, the majority are for one and two bedroom flats. One site (Charles Stuart House) will contain four three bedroom units.

At the end of October 2015 the total amount of office floorspace that could potentially be lost, if all current prior notifications/approvals are implemented totals at least 5,036.86m². This amounts to approx. 4.8% of the Borough's office stock⁶.

⁶ This percentage is calculated using the 2012 Rateable Value Statistics which indicate that there is 104506 sq m of office space in the Borough.

None of these proposals are required to make affordable housing contributions even if they are providing over ten new units. There is also no way of securing on site infrastructure through the s106 process. The new units will still be liable for the Community Infrastructure Levy (CIL) if the site has not been occupied for six months within the last three years (but where they have been they are not CIL liable as there is no new floorspace in a conversion).

b) Type of office floorspace being lost

Much of the Borough's established office market is located in and around Epsom town centre and it is of concern that a number of the office buildings to be converted to residential under permitted development relate to medium sized, good quality office buildings in the town centre. Most notably Rutland House, a grade A modern building located on South Street and in close proximity to Nuffield Health and Atkins, has been subject to prior approval with over 30 units developed in the 1335.86m² office floorspace.

Outside the town centre an older but sizeable (1298 m²) serviced office building has been subject to prior notification approval affecting a number of businesses.

c) Loss of firms:

We have no evidence of local firms having to move out of the area as a result of office floorspace changing to residential use. Around a third of the premises were wholly vacant before the prior notification was submitted. However, almost all buildings identified are good quality and in close proximity to the town centre amenities, offering opportunities for business expanding or moving into the area.

Anecdotally we are aware of tenants within serviced office accommodation being evicted and some businesses being relocated into 19 West Street, Epsom.

Local Impact

(1) Contribution to the supply of new homes.

The prior approval process has so far yielded a potential 70 new dwellings, around 40% of the year's new housing requirement.

Moreover, the process is providing a supply of 1 and 2 bed flats for which there is a need. Around two thirds of the dwellings approved to date are for 1 bedroom flats

which could be considered to be at the less expensive end of the housing market. However, having viewed recent marketing material for some of the conversions they appear to be being marketed at the higher end of the housing market, as exclusive high- end properties priced as highly as £675,000 for a two bedroomed unit. This is certainly not considered an 'affordable' price.

(2) Impact on business rates, Council tax

From the list of approved schemes, ten business rate properties have been lost from the Valuation List with a total reduction in business rate income in 2015/16 of £214,309.

Overall conclusions.

The Council's planning policies are being undermined by the PDCOU legislation. Whilst the overall number of PD applications has been limited in the borough the buildings affected have generally been good quality, town centre located schemes rather than poorer quality, high vacancy properties. This is in direct contrast to neighbouring Mole Valley that has lost around 30% of its office space, but the majority to date has been lower quality and vacant.

As the Plan E programme of improvements begins it will become even more important to have quality office stock to attract and retain business in the town centre.

Article 4 Direction

Following the Government's recent extension of the policy Epsom & Ewell Borough Council is looking to gain PDR exemption for key employment sites in the town centre. The buildings identified offer the opportunity to provide space for existing and new business to expand, create jobs and deliver economic growth.

The Plan E vision states that 'over the next 20 years East Street will establish itself as the main business district for both Epsom and the wider borough'. It also seeks to deliver 6000 – 7000 sq m of new employment floor space within the town centre up to 2026. Under this policy loss of existing employment uses within the Town Centre will be resisted.

Last week the Gatwick Diamond Executive Director reported to Epsom business leaders that there is a major shortage of modern office space in the Gatwick Diamond area. It has been difficult to identify appropriate space for inward

investment enquiries and the lack of small business start up and grow on space is even more acute, despite strong demand.

Similarly Surrey County Council has reported that the **Outer London and M25 Office sector**, known as the 'doughnut', has experienced the highest rental growth since 2000, according to a new report from CBRE. The latest CBRE Monthly index has seen rental values for offices in the 'doughnut' grow by 1.0% in the last month, the fastest monthly rate since July 2000 (1.4%) and growth of 4.2% since January.

Demand from service orientated SMEs is likely to increase fuelled by the projected increase in the Borough population. The options to accommodate this requirement are limited, and therefore critical to protect what we have. Once commercial space and employment land loses its status and is converted to residential it is gone forever. As is its local wealth creation potential.

Buildings identified for Article 4 Direction

Buildings have been selected because they meet at least two of the following criteria:

- Occupied
- Known at risk
- Good quality / Grade A stock
- Town centre
- Highly sustainable location
- Previously served
- Important employment designation

The town centre is a location where high quality premises are demanded from a variety of occupiers such as creative, financial, business and professional services. Epsom is an attractive and conveniently located to London & the South East with good transport links. It is a location of choice for a growing business community that adds to the vibrancy of the town centre. Over the last couple of years we have seen planning approval given to Atkins to develop its flagship Epsom campus, already housing the largest concentration of employees in the UK. Nuffield Health chose Epsom town centre for its UK headquarters, as it had offered good quality office

stock, close to rail and town centre facilities as well as nearby green space. Macdermott expanded its offices within Global House and German cyber security company Cyclax selected Epsom as a base for its first UK office. The town centre was also being seriously considered by Lidl for its new HQ operation, narrowly losing out to Kingston on transport factors.

Article 4 Direction by other authorities

We understand that Mole Valley is looking into Article 4 Direction now that the legislation has been made permanent. Whilst the early applications have related to smaller, lower quality stock there is concern that if major employers in Mole Valley decide to rationalise operations and relocate landlords may take the opportunity to realise a residential value of their office floorspace or major sites.

Richmond has seen the highest number of prior notifications of any London borough with 400 applications received. This could result in potentially losing 71,000 sq m / 24% of office space. Richmond Council has removed PD rights within 12 areas which are key office locations in the Borough, including parts of Richmond, Twickenham and Teddington town centres using Article 4 Direction. The Council did so on the basis that remaining space for commercial offices in the Borough will see a huge rental increase whilst losing local jobs.

Crawley is also looking to put Article 4 Direction in place in the Manor Royal business district. Through the PDR process the borough has already lost quarter of a million sq ft of employment space. It is looking to safeguard the rest of the business space as well as support those businesses that have been affected and displaced.

Brighton & Hove City Council has also identified and served Article 4 Direction in certain areas of the city to safeguard key employment sites.

Julia Owen
November 2015

Appendix B Commercial Property to Residential November 2015

Application No	Address	Ward	Submission Date	Decision Date	Decision	Completion Date	Units Proposed	Net Change	Currently occupied or vacant (IF KNOWN)	M2 B1 lost (m2)	Rateable Value	BR Income	Description
14/01219	Ryebrook Studios, Woodcote Site, Epsom	Woodcote	21/11/2014	29/12/2014	Prior Approval not required		12F		NOW VACANT	1298	118,975	15/16 £47,229 14/15 £46,244 13/14 £45,275	modern, managed office space - closed Jan 2015
14/00724	19 Church Road, Epsom	Town	31/10/2014	01/12/2014	Prior Approval not required		C3			185	6,800	15/16 £3,264 14/15 £3,203 13/14 £3,142	From Google - Sweet Chariot Leisure located at the Clubhouse, 19 Church Road KT17 4DZ. From street view looks residential
14/00638	Ground Floor (Front Of) Charles Stuart House 28 Church Street Epsom Surrey KT17 4QP	Town	08/08/2014	25.09.2014	Prior Approval not required	completed - residential marketing material available	1Fx3B	1	OCCUPIED	187	19,000	15/16 £9,367 14/15 £9,158 13/14 £8,949	Grade A office space - brochure available
14/00637	Ground Floor (Rear Of) Charles Stuart House 28 Church Street Epsom Surrey KT17 4QP	Town	08/08/2014	25.09.2014	Prior Approval not required	completed - residential marketing material available	1Fx3B	1	OCCUPIED	167	14,000	15/16 £6,720 14/15 £6,594 13/14 £6,468	Grade A office space - brochure available
13/01082	Nelson House, 1A Church Street, Epsom KT17 4PF	Town	19/11/2013	13/01.2014	Prior Approval not required	under construction	3F	32	OFFICE SPACE VACANT, GROUND FLOOR CURRENTLY RETAIL		17,800	15/16 £8,544 14/15 £8,384 13/14 £8,224	
13/01553	Second Floor (rear) Charles Stuart House, 28 Church Street, Epsom, KT17 4QP	Town	21/03/2014	09/05/2014	Prior Approval Not Required	completed - residential marketing material available	1Fx3B	1	OCCUPIED	181	14,500	15/16 £6,960 14/15 £6,830 13/14 £6,699	Grade A office space - brochure available
13/01552	Second Floor (front) Charles Stuart House, 28 Church Street, Epsom, KT17 4QP	Town	21/03/2014	09/05/2014	Prior Approval Not Required	completed - residential marketing material available	1Fx2B	1	OCCUPIED	169	14,250	15/16 £6,840 14/15 £6,712 13/14 £6,584	Grade A office space - brochure available
13/01550	First Floor (front) Charles Stuart House, 28 Church Street, Epsom, KT17 4QP	Town	21/03/2014	09/05/2014	Prior Approval Not Required	completed - residential marketing material available	1Fx2B	1	OCCUPIED	181	34,250	15/16 £16,885 14/15 £16,508 13/14 £16,132	Grade A office space - brochure available
13/01548	First Floor (Rear) Charles Stuart House, 28 Church Street, Epsom, KT17 4QP	Town	21/03/2014	09/05/2014	Prior Approval Not Required	completed - residential marketing material available	1Fx3B	1	OCCUPIED	194	included in above		Grade A office space - brochure available
14/01522	Rutland House, 57 - 59 South Street, Epsom, KT18 7PR	Town		30.01.15	Prior Approval not Required	completed - residential marketing	26F X 1B, 6 x 2B		VACANT	133.86	165,000	15/16 £81,345 14/15 £79,530 13/14 £77,715	High quality office space - brochure available

						material available							
13/00617	7 - 7A Ashley Road, Epsom, KT18 5AQ	Town	09/08/2013	31/03/2015	Allowed At Appeal	completed - residential market ing material available	3F x 2B	3	OCCUPIED	235	33,250 deleted 26.06.14	14/15 £3,820 13/14 £15,661	ex retail, converted to office to expedite PDCOU?
13/00886	Deeburn, 15 Depot Road, Epsom, KT17 4RJ	Town	07/10/2013	03/12/2013	Permit Prior Approval		1F x 1B	1	VACANT	Unsure	4,300 deleted 06.06.14	0	modern 1990s building - looks residential. Now shown as one Band C dwelling
13/00656/PDCOU	33 High Street, Ewell, KT17 1SA	Ewell	19/08/2013	14/10/2013	Permit Prior Approval	25/07/2014	1Fx2B	0	UNKNOWN	79	11,300	0	Mid 18thC shop originally built as double fronted house
14/01240	Headway House, 15 - 17 Chessington Road, Ewell, KT17 1TS	Ewell	21/11/2014	09/01/2015	Prior Approval not required		11	11	VACANT	825	55,000	15/16 £27,155 14/15 £26,510 13/14 £25,905	Originally Bytes House - appears on appeal withdrawn list too
15/00308	Office above Cadogan House, 4-6 High Street, Epsom	Town	08/04/2015	20/05/2015	Prior Approval not required	outstanding permission	6Fx1B 1F x2B						
15/00592	69-71 High Street, Epsom	Town	12/08/2015	29/09/2015	Prior Approval not required	outstanding permission	2F	2					
15/00548	Brookland House, 2B West Street, Ewell	Ewell	09/07/2015	03/09/2015	Prior Approval not required	outstanding permission	1F	1	OCCUPIED				Shop? BPS Interiors
15/00520	Apex House, 10 West Street, Epsom	Town	09/07/2015	26/08/2015	Prior Approval not required	outstanding permission	4F	4	OCCUPIED				Estate Agents - Huggins, Edwards and Sharp
15/00494	Felix House, 83-85 East Street	Town	30/06/2015	18/08/2015	Prior Approval not required	outstanding permission	16F	16	OCCUPIED				Oracle Group - PR and marketing agency
14/01920	24-28 West Street	Town	08/04/2015	20/05/2015	Prior Approval not required	outstanding permission	C3		OCCUPIED?				Estate Agents - Fine and Country
14/00504	Novellus Court, 61 South Street, Epsom, KT18 7PX	Town			Prior Approval not required	under construction	C3		Under construction	1224	82,000	15/16 £40,426 14/15 £39,524 13/14 £38,622	
Refusals / Withdrawn													
14/00780	6-7 Market Parade, High Street, Ewell	Ewell	29/08/2014	03/10/2014			C3				25,250	15/16 £12,448 14/15 £12,171 13/14 £11,893	
14/00540	Apex House, 10 West Street, Epsom, KT18 7RG	Town	01/08/2014	09/09/2014	Refused		4Fx1B, 3Fx2B	7	UNKNOWN	524.5	29,500	15/16 £14,544 14/15 £14,219 13/14 £13,895	
14/00180	127 East Street, Epsom, KT17 1EJ	Town	23/05/2014	26/06/2014	Prior Approval Required and Refused		1Fx2B	1	UNKNOWN	70	unable to identify		
13/00468	Admark House, 2 West Street, Ewell, KT17 1UU	Ewell	09/07/2013	16/09/2013	Refused		1F x 1B, 1F x 2B	2	OCCUPIED	No info	22,200	15/16 £10,656 14/15 £10,456 13/14 £10,256	

13/00774	Rosebery House, 55 East Street, Epsom, KT17 1BP	Town	12/09/2013	08/11/2013	Prior Approval Required and Refused		24x 1B, 11 x 2B	?	VACANT	1595	213,000	15/16 £105,009 14/15 £102,666 13/14 £100,323	
13/00441	16A East Street, Epsom, KT17 1HH	Town	04/07/2013	29/08/2013	Prior Approval Required and Refused		2F	2	VACANT	No info	8050 deleted 05/01/15	14/15 £3,820 13/14 £2,898	
13/00894	1 High Street, Ewell, KT17 1SB	Ewell	08/10/2013	04/12/2013	Refused		No not specified	?			13,250	15/16 £6,532 14/15 £6,387 13/14 £6,241	
13/00894	21 High Street, Ewell, KT17 1SB	Ewell	08/10/2013	04/12/2013	Prior Approval Required and Refused		No not specified	?	UNKNOWN	147.5	6,500	15/16 £3,120 14/15 £3,062 13/14 £3,003	

CROSSRAIL 2 CONSULTATION

<u>Report of the:</u>	Head of Place Development
<u>Contact:</u>	Mark Berry Karol Jakubczyk
<u>Urgent Decision?(yes/no)</u>	No
If yes, reason urgent decision required:	
<u>Annexes/Appendices (attached):</u>	Annex 1: Draft Response to Crossrail 2 Consultation (to be distributed at meeting)
<u>Other available papers (not attached):</u>	Transport for London Crossrail 2 Consultation October 2015

REPORT SUMMARY

Crossrail 2 is a proposed new railway that could serve London and the wider South East of England. It is envisaged that the one of its southern branches would extend into Epsom. This could bring considerable qualitative benefits to the Borough – including significantly improved rail services into and across London and economic growth for our town centres and employment areas. Whilst Crossrail 2 would also seek to unlock sites for new housing growth, it is currently envisaged that most of these will be located in North London and beyond. In contrast the scale of additional housing growth predicted for Epsom & Ewell is more modest.

Transport for London and Network Rail are currently seeking views on the proposal. Their consultation runs until January 2016. This is an opportunity for the Borough Council to set out how it believes Crossrail 2 should benefit the Borough.

RECOMMENDATION

Notes

1. The Committee considers the implications of the Crossrail 2 proposal and the draft response to the current consultation. Subject to any amendments, the response be submitted to the consultation process.

1 Implications for the Council's Key Priorities, Service Plans and Community Strategy

- 1.1 Crossrail 2 is seeks to bring significant improvements to public transport access to London and the wider South East of England. The impact of this proposal has a bearing on many of the Council's key priorities including economic vitality, quality of life, visual appearance and sustainability.
- 1.2 The Annual Service Plan includes related planning policy objectives and an overarching objective of Economic Vitality, the achievement of which could be affected by the long term delivery of Crossrail 2.

- 1.3 Crossrail 2 has the potential to bring significant improvements to Epsom Town Centre's economic vitality and viability in the long term. Plan E Epsom Town Centre Area Action Plan forms a key part of our Local Plan, which assists in the spatial delivery of the objectives of the Sustainable Community Strategy and the Council's Key Priorities.

2 Crossrail 2

- 2.1 Crossrail 2 is the latest name given to a long-standing proposal to build a new railway network serving London and the wider South East. The proposal seeks to connect existing networks in Surrey and Hertfordshire via new tunnels and stations in central London¹. The proposal will also link with London Underground, London Overground, Crossrail 1, National Rail, High Speed 1, High Speed 2, the London Tram network and international rail services.
- 2.2 The proposal is being promoted on the basis that it will secure significant benefits across the whole region. Its exponents state that it will do this by providing new homes and jobs; by improving the quality of life; by making it easier to travel; and by encouraging more sustainable travel patterns.
- 2.3 Work in support of the proposal has been underway for some time. As its title implies, it is being branded as the logical 'north-south' progression of Crossrail 1². The alignment of the core Crossrail 2 route through London³ has been safeguarded since 2007/08. The route south into Epsom Station is not formally safeguarded as it will utilize the existing railway line.
- 2.4 The proposal does not envisage additional railway lines running south from Wimbledon into Epsom Station. However, it will secure an increased 'metro' service into central London and beyond. There are also plans to extend the platforms at Epsom Station in order to accommodate 12 carriage trains.
- 2.5 In addition to securing significant improvements to the public transport network, the delivery of Crossrail 2 is being justified on the basis that it will unlock sustainable growth across the capital and the South East. Current growth projections⁴ suggest that the new railway route could secure up to 200,000 new homes across its length during the period until 2060. The majority of these new homes will be delivered on sites located to the north of London, along the Lea Valley. In contrast, the projections anticipate the delivery of about 1500 additional new homes⁵ within the Borough.
- 2.6 A business case supporting the proposal was submitted to the Treasury in June 2015. It is understood that the construction of the new railway route will be implemented through a hybrid Bill, which is anticipated to go before Parliament during 2018. Should the Bill be successful, construction could take place during the period 2020 until 2030.

¹ These will lie between Wimbledon, Tottenham Hale and New Southgate.

² This is a new 'east-west' railway network that is currently in the final stages of construction.

³ The term 'core route' relates to new stations, tunnels and sections of track.

⁴ This has been prepared by Network Rail and Transport for London in support of the Crossrail 2 proposal.

⁵ It is believed that these new homes will be in addition to demand generated from within the Borough's local housing market area.

- 2.7 In advance of the Bill, Network Rail and Transport for London are carrying out a consultation exercise on the general principal of the proposed new railway route. The consultation runs until early January 2016. This provides the Council with a good opportunity to make its position on the proposed infrastructure improvements and any associated growth known. For example, we call clearly state whether we are supportive of crude quantitative approach, or whether we prefer smarter qualitative growth. A draft response will be circulated at the Committee meeting.

3 Financial and Manpower Implications

- 3.1 The resourcing of the current Local Plan work programme was approved by the Licensing and Planning Policy Committee in September 2014. That work programme did not factor in any additional work required to engage in the development of the Crossrail 2 proposals. However, strategic infrastructure planning is an essential consideration for the local plan. Consequently, some adjustment in our priorities may be necessary in order to accommodate this work.

4 Equalities and Other Legal Implications

- 4.1 None for the purposes of this report.

5 Sustainability Policy and Community Safety Implications

- 5.1 Improvements to public transport infrastructure will help in the future delivery of sustainable growth. However, other factors, such as the capacity of other essential community infrastructure assets and the impact of future growth on the Borough's unique visual character and appearance will also need to be taken into account.
- 5.2 There are no significant Community Safety considerations.

6 Partnerships

- 6.1 No specific considerations.

7 Risk Assessment

- 7.1 Crossrail 2 is a key strategic infrastructure improvement that could bring significant benefits to the Borough. However, these benefits will need to be carefully considered. It is important that the Borough Council uses this opportunity to engage with Network Rail and Transport for London from the outset. Failure to take appropriate and proportionate action now may have an adverse impact in the medium-long term.

8 Conclusion and Recommendations

- 8.1 The Committee are asked to consider the implications of the Crossrail 2 proposal and the draft response to the current consultation. Subject to any amendments, the response be submitted to the consultation process.

WARD(S) AFFECTED: All

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**PARKING STANDARDS FOR RESIDENTIAL DEVELOPMENT SUPPLEMENTARY
PLANNING DOCUMENT**

<u>Report of the:</u>	Head of Place Development
<u>Contact:</u>	Michael Clarkson
<u>Urgent Decision?(yes/no)</u>	No
<u>If yes, reason urgent decision required:</u>	
<u>Annexes/Appendices (attached):</u>	Annex 1: Schedule of Consultation Comments, Officers' Responses and Suggested Actions
<u>Other available papers (not attached):</u>	Licensing and Planning Policy Committee Report Item 07 17 September 2015 Surrey County Council Vehicular and Cycle Parking Guidance 2012

REPORT SUMMARY

The Parking Standards for Residential Development Supplementary Planning Document (SPD) was approved by the Committee for public consultation in September 2015. The consultation has now closed.

This report provides an overview of the consultation comments received, Officers' responses, and possible amendments to the SPD as a result. Subject to the Committee's agreement to the minor amendments suggested through the consultation the SPD can now be adopted.

RECOMMENDATION

1. That the Committee consider the responses to the consultation.
2. That the Committee consider the suggested amendments resulting from the consultation and, subject to any additional amendments, agree the Parking Standards for Residential Development Supplementary Planning Document (SPD) for adoption.

Notes

1 Implications for the Council's Key Priorities, Service Plans and Community Strategy

- 1.1 The Local Plan provides the framework for the spatial delivery of the objectives of the Sustainable Community Strategy and the Council's Key Priorities. The Core Strategy and Development Management Policies Document form key components of the Local Plan. Policies CS16 and DM37 contained within these respective documents form the basis on which to pursue the introduction of Borough-wide parking standards.

2 Background

- 2.1 The County Council's Vehicular and Cycle Parking Guidance 2012 is currently the only reference point for parking standards in the determination of individual planning applications. Following the adoption of the Development Management Policies Document on 15 October 2015, the Council can now adopt its own local parking standards in accordance with Policy DM37.
- 2.2 In anticipation of the adoption of the Development Management Policies Document, the Council consulted on a draft Supplementary Planning Document (SPD). The SPD outlines minimum parking standards for new residential development. These standards are based on detailed background evidence, which presents a clear and robust confirmation of the need to introduce parking standards for residential development.
- 2.3 The parking standards set out in the SPD only apply to residential development. This is because the majority of new development coming forward over the plan period is likely to be for residential use. The level of parking needed for other non-residential uses is difficult to calculate and is best assessed on an individual basis with reference to site-specific constraints. Commercial uses such as supermarkets that may come forward during the plan period will therefore be subject to individual assessment with reference to the Surrey County Council Guidance. Proposals for mixed use developments will need to use a combination of the two.

3 Consultation Outcomes and Recommendations

- 3.1 A copy of the consultation comments received, Officers' responses, and suggested actions are attached under Annex 1. The comments were mostly from individuals, although organisations such as the Epsom Civic Society, Epsom & Ewell Cycling Action Group, LA21 / Environment Forum Transport Group, Surrey County Council. and the Environment Agency also responded.

- 3.2 The comments received were mixed, with some respondents feeling that the minimum standards were adequate, some feeling they were too low and some arguing that they were too high and did not take into account proximity to public transport and other amenities in areas outside Epsom Town Centre. Officers' responses stressed that as they were minimum standards, the Council could impose a higher level of provision once site specific factors and other evidence were taken into account. Similarly, a developer might seek exceptions to the standards where it could be robustly demonstrated that there would be no harmful impact on the surrounding area in terms of street scene or availability of on-street parking. Both of these scenarios are best assessed on a case-by-case basis.
- 3.3 Many respondents felt that other uses such as student accommodation and Houses in Multiple Occupation (HMOs) ought to be included within the standards. As these are not expected to form a high proportion of expected growth over the remainder of the Plan period (i.e. to 2026), it is considered that these types of development are best assessed on a case-by-case basis.
- 3.4 It is recommended that the minor amendments identified as suggested actions can be incorporated into the final version of the SPD. These amendments consist of slight increases to the minimum garage size previously identified in order to prevent garages being provided that are too small to house vehicles, and some more general amendments to provide clarity to the text.

4 Financial and Manpower Implications

- 4.1 There are adequate staff resources to facilitate the adoption of the SPD.

5 Equalities and Other Legal Implications

- 5.1 None for the purposes of this report.

6 Sustainability Policy and Community Safety Implications

- 6.1 The provision of appropriate off-street parking through the introduction of minimum parking standards will contribute to maintaining the character and appearance of the Borough, particularly in areas of historic interest, by reducing the need for on-street parking.
- 6.2 Supplementary Planning Documents (SPDs) are no longer subject to Sustainability Appraisal. However, the Core Strategy and Development Management Policies on which this SPD is based have been subject to this process.

7 Partnerships

- 7.1 The Council will continue to work with Surrey County Council to ensure adequate provision of parking in new development and to ensure highway safety is maintained.

8 Risk Assessment

- 6.1 The provision of up-to-date parking standards ensures that the Local Plan responds to this important issue and provides the Council with the necessary policy tools required to manage future residential development. There is a risk that the absence of up-to-date standards could allow unsustainable developments to come forward through the planning appeal process.

9 Conclusion and Recommendations

- 9.1 The adoption of new Borough-wide parking standards for residential development will ensure appropriate provision of off-street parking in future development.
- 9.2 It is recommended that the Committee consider the suggested amendments resulting from the consultation and, subject to any other amendments, agree the Parking Standards for Residential Development Supplementary Planning Document for adoption.

WARD(S) AFFECTED: All

Consultation Responses
Draft Parking Standards for Residential Development SPD 2015

ID	Full Name	Organisation	Do you consider the proposed Minimum Parking Standards for Residential Development (Table 1, Page 4) appropriate in meeting the future demand for parking in Epsom & Ewell? If you disagree with the proposed standards please set out the evidence to support your view.	Do you have any other comments that you wish to make in relation to the Parking Standards for Residential Development? If so, please clearly state which paragraph(s) you are commenting upon.	Officer Response & Suggested Actions
1	Ms Julie Morris		What is proposed is still not sufficient to provide what is desired by occupants and what is realistically needed.	Whatever the outcome, minimum parking standards should apply to multiple occupancy development and also to student accommodation.	<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p>Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-</p>

Consultation Responses
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					<p>case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
2	Mrs Lindsey Steedman			<p>The minimum parking standards proposed should apply to multiple occupancy properties and to student accommodation otherwise areas that are already congested simply become worse if these properties are built without sufficient parking space.</p>	<p><i>Response:</i> Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
3	Mr Mike Barnett		<p>The proposal goes some way forward, but is still insufficient to account for the needs of residents in the modern age. For example: a 2 bedroom flat should reasonably provide for 2 car-owning professionals, therefore 2 parking</p>	<p>Certain types of accommodation are not mentioned, e.g. Student housing. The Minimum Parking Standards should apply to ALL residential development.</p>	<p><i>Response:</i> National planning policy states that parking standards should take into account both development types and local car ownership levels. The evidence indicates that levels</p>

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			spaces are required. Similar consideration should be given across the range of dwellings mentioned.		<p>of car ownership generally correspond with household size and number of habitable rooms and bedrooms. Our minimum standards reflect this evidence and consequently lower levels of provision in flatted developments are considered appropriate.</p> <p>Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
4	Mr John Willson		I support the formula you have proposed in respect of the type of dwelling and the number of parking spaces relevant to the type of dwelling. However you seem to have missed out two categories of	No - the above covers the points I wanted to address. Otherwise I support the proposals in full, but would like the addition of the above two categories of dwelling.	<p><i>Response:</i> Support welcomed. Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student</p>

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			dwelling that would if they were not to be included could have a severe impact on parking and hence traffic flow in the borough. Also by missing out these two categories, you will be allowing a developer to wriggle through the residence to parking space formula you have proposed. The two categories are: 1) Student accommodation / hostels, where it is possible that each student room within a dwelling could equate to one car. So for example a small student building of twelve rooms could equate to 12 cars, whereas the same size of building for a family could equate to three cars on your proposed formula. 2) Multiple occupancy buildings.		accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use. <i>Suggested Actions:</i> None
5	Amanda Purdye	Gatwick Airport Limited		The draft parking standards do not appear to have any implications for Aerodrome Safeguarding and therefore we have no further comments to make.	<i>Response:</i> N/A <i>Suggested Actions:</i> None
6	Miss Pamela Bickerton Smith			Stress levels here very high re lack of parking for existing residents. Due to local hospital workers, 9 to 5 and shift workers to late in the evening. Hospital outpatients and visitors too. We can rarely park in	<i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies.

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				our own street now. Existing residents often have to sneak into the student's parking opposite but this won't be tolerated for long by the college. Or, park a long way away and walk home, with small children, shopping etc. So difficult. So many of us with no off road parking are desperate for Resident's Parking, and quickly!	<p>These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p><i>Suggested Actions:</i> None</p>
7	Mrs Adele Rayment		There is an enormous lack of parking facilities in the area, office workers are using residential roads to park causing terrible 'bottlenecks' and damage to cars.	If any new residential properties are built they must have at least 1 space per flat or 2 spaces per house. If the proposed student flats on Mill Road are built they will need 1 space per flat to accommodate the increase volume of traffic parking in the area.	<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p>Parking provision for Houses</p>

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					<p>in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
8	Mr Chris Chappell		<p>I agree with previous comments that the proposal is still insufficient to account for the needs of residents in the modern age. Most residential property, including flats should have provision to park 2 cars. We can see many examples of flat dwellers cars having to park on the nearby roads because there is insufficient parking available to them where they live.</p>	<p>Again, I agree with previous observations where certain types of accommodation are not mentioned. Student housing and multiple occupancy flats should be added to sew up any loop holes. The Minimum Parking Standards should apply to ALL residential development.</p>	<p><i>Response:</i> National planning policy states that parking standards should take into account both development types and local car ownership levels. The evidence indicates that levels of car ownership generally correspond with household size and number of habitable rooms and bedrooms. Our minimum standards reflect this evidence and consequently lower levels of provision in flatted developments are considered appropriate.</p>

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					<p>Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
9	Adrian Clark		<p>It's probably sufficient for outer areas of the borough, but 0.75 spaces per person in a town centre flat will not be sufficient, e.g. for two professionals sharing.</p>	<p>While the standards seem broadly sufficient, the table only refers to "traditional" permanent residential properties. The guidelines should be extended to cover such developments as student residences, and the figures should apply on a room-by-room basis. Student halls have a huge effect on congestion and over-subscription of surrounding residential parking.</p>	<p><i>Response:</i> National planning policy states that local parking standards should take into account the accessibility of development as well as the availability of and opportunities for public transport, together with local car ownership levels. The evidence indicates that all of these factors should result in a lower minimum standard in Epsom Town Centre.</p> <p>Parking provision for Houses in Multiple Occupation</p>

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					<p>(HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
10	Iain McNeil		<p>The allocated parking is far too low for modern standards. In 2013 there were 35 million cars in the UK. This is a rise of 1.5 % on the previous year. There are around 63 million people in the UK. This gives a ratio of 0.55 cars per person. If a development is designed to house 100 people it should have a minimum of 55 parking spaces. See (https://en.wikipedia.org/wiki/Demography_of_the_United_Kingdom) and (https://www.gov.uk/government/statistics/vehicle-licensing-statistics-2013) This is just the average and some areas will have a much higher % of drivers than others. We</p>		<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p>Parking provision for Houses in Multiple Occupation</p>

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			also need to future proof to make sure the parking is adequate for the next 20 years or more and take account of the growth rate of 1.5% per year. The concerning thing is the growth rate itself is increasing. In 2012 it was only 1.2% so growth is accelerating and we should expect significantly more cars than ever in the coming years. The current proposals don't come close to providing enough parking, especially for areas of student accommodation and do not take in to account modern living practices and plan for future growth.		(HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use. <i>Suggested Actions:</i> None
11	Mrs Katie Bedford		The table is appropriate to meet the needs of flats and houses, but you have missed out student accommodation. This needs to be included as the density of individual households potentially each owning a car would be very high.	Paragraph - minimum standards for residential developments This needs to include student accommodation as each room would effectively be a separate household with the potential to own a car. If not included, the knock on effect on Epsom streets could be very difficult. Each student room should have 1 car parking space allocated.	<i>Response:</i> Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use. <i>Suggested Actions:</i> None

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12	Mrs Maureen Willson		<p>No, I believe the allocated parking for all types of development within the Minimum Parking Standards for Residential Development is set too low. Just two examples: i) one four-bedroom house will often have two adults and two children who, when they reach the age at which they can drive, each own a car. Four parking spaces are often needed. ii) two-bedroom flats should have parking for two cars. Most professional couples have their own cars as couples these days lead, at least in part, independent social lives requiring separate cars. Patterns of living have changed dramatically in recent years. Your list of dwellings does not include student accommodation. Would you amend this, please? Again, patterns of behaviour and car ownership have changed dramatically among young people. Each student room should have an allocation of one parking space. Students, on the whole, will own cars and will park them on the roads.</p>	<p>Just a couple of general comments. Your background evidence does not seem to have been adequately taken into account when deciding the Minimum Standards. You also need to take into account the lack of parking facilities we already have to cope with. School staff and school visitors park on our roads as schools have inadequate parking facilities. Increasing provision of wrap-around-care before and after standard school hours increase this pressure on parking spaces on the streets. Commuters clog our roads. It is of vital importance that new developments are given more than the absolute minimum on-site car parking facilities.</p>	<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p><i>Suggested Actions:</i> None</p>
13	Mr. Nigel Hawkes		<p>The standards are fine for the larger properties but inadequate for</p>	<p>What is proposed may, unwittingly, over time contribute to a further</p>	<p><i>Response:</i> National planning policy</p>

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			<p>the smaller ones. The minimum, in my view, should be two spaces per dwelling and, in the case of flats, an extra space per, say, 4 or 5 dwellings. This is only what we had back in the '60s where many fine developments such as Briavels Court and Sandown Lodge were constructed and still contribute positively to the town's appearance; unlike much more unsympathetic recent developments. Evidence-well, it's all around us in the cluttering of the streets and the increase in the stress and "edginess" of the population.</p>	<p>class polarisation of areas of the town, i.e., spacious, larger properties contrasted with "ghetto-like", cramped areas. One has only to compare, say, Reigate and Esher, or-nearer to home-Ashted, with Epsom to see how the town has deteriorated since the 1960s.</p>	<p>states that parking standards should take into account both development types and local car ownership levels. The evidence indicates that levels of car ownership generally correspond with household size and number of habitable rooms and bedrooms. Our minimum standards reflect this evidence and consequently lower levels of provision in flatted developments are considered appropriate.</p> <p><i>Suggested Actions:</i> None</p>
14	Mr Malcolm Boyd	Epsom Civic Society	<p>We welcome the Provision of Minimum Standards for Parking in Residential Areas of Epsom. After deliberation we agree that the provisions within Table 1 are appropriate. We have one comment that we feel that will assist its implementation considerably.</p>	<p>Paragraph 4.3 is an important qualification of the Standards and we suggest that there should be a footnote to Table 1 linking the Standards to Paragraph 4.3. We also suggest that in Paragraph 4.4 the word 'up' should be inserted between 'rounded' and 'to' in order to avoid ambiguity. In Paragraph 4.6, we are concerned that modern car width being around 2m the minimum width of 2.7m may be insufficient.</p>	<p><i>Response:</i> Support welcomed. The SPD should be read as a whole together with and alongside the Council's Local Plan policies, and therefore Paragraph 4.3 should be read alongside Table 1. Officers consider that there is no need to add an additional footnote linking these.</p> <p><i>Suggested Actions:</i></p>

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					<p>Consider clarifying Paragraph 4.4 to avoid ambiguity.</p> <p>Consider increasing minimum garage width to 3m.</p>
15	Mr Ian Booker		<p>It would help if you included garage sizes from recent developments which would demonstrate that sizes provided at the discretion of Developers have led to garages people cannot park their cars in. Just go to Parkview Estate built by Linden Homes to see the result. Then the dimensions of 2.7m x 5.1m can be seen in context. (i.e. is it larger or small than recently built garages which have proved too small). I would also add a table of car dimensions that would see how they would fit into a garage. Garage door openings need to be stipulated as I have seen many garages where the car cannot get through the door opening. On the recent West Park development as part of my research I inspected a £900k house where my small sports car would not fit through the garage door! Again take for example the BMW X3 which is 2.09m x 4.66m overall (including</p>		<p><i>Response:</i> The Surrey Vehicular & Cycle Parking Guidance contained no minimum garage size requirements and consequently the sizes of garages provided in recent developments have not been monitored. This makes data difficult to obtain on the sizes of garages in recent developments. Minimum garage sizes have been determined from comparator standards in adjoining authorities; however, Officers are aware that some recently built garages have proved too small to store cars. Introducing minimum garage sizes will help to resolve this problem.</p> <p><i>Suggested Actions:</i> Consider increasing minimum garage sizes to 3m x 5.5m in</p>

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			wing mirrors). Drivers will not park closer than 200mm to a wall so if the driver parked close to one side (which will be very difficult if not impossible as the garage door width will not be as wide as the garage) that will only leave 410mm in which to open the door and get out. The wing mirror of course may prevent the door opening this far. In summary I suggest a garage of 3.0m x 6.1m should be the preferred minimum size with a full width door.		order to take into account larger cars and prevent unsuitable garages from being provided.
16	Mr Colin Wing	LA21 / Environment Forum Transport Group	No. The evidence base fails to take into account the proximity of public transport and other amenities in the different parts of the borough. If these are taken into account, there is a case not only for a minimum quota of zero in Epsom Town Centre but also for applying the Town Centre minima to centres of Ewell and Stoneleigh. Without a minimum provision of zero spaces, it will not be possible to convert accommodation over many shops to residential use. Epsom and Ewell already suffer badly from traffic congestion. Parking (and using) more cars will only make the situation worse.		<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances.</p> <p>Where there is clear justification, it may be possible to provide lower levels of provision than the minimum standards; however, this is best assessed on a</p>

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					<p>case-by-case basis where it can be robustly demonstrated that there will be no harmful impact on the surrounding area in terms of street scene or the availability of on-street parking.</p> <p>The evidence suggests that car ownership levels will continue to increase and the Council believes that in most cases, reduced or nil parking provision does not effectively discourage the use of cars; rather it can exacerbate on-street parking conflict. Setting minimum standards will help to ease on-street parking stress.</p> <p><i>Suggested Actions:</i> None</p>
17	Mr Bob Eberhard	Epsom & Ewell Cycling Action Group	Our concern is that the proposed increase in car parking spaces in new Town Centre developments will prove an increased deterrent to cycling to the Town Centre, and contrary to policy aims to "encourage greater use of public transport, cycling and walking"		<p><i>Response:</i> The Council continues to encourage sustainable transport and its Local Plan policies reflect this approach. Adequate provision of cycle spaces will still be required for new developments.</p>

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					<p>Where there is clear justification, it may be possible to provide lower levels of provision than the minimum standards; however, this is best assessed on a case-by-case basis where it can be robustly demonstrated that there will be no harmful impact on the surrounding area in terms of street scene or the availability of on-street parking.</p> <p>The Council believes that in most cases, reduced or nil parking provision does not effectively discourage the use of cars; rather it can exacerbate on-street parking conflict. Setting minimum standards will help to ease on-street parking stress.</p> <p><i>Suggested Actions:</i> None</p>
18	Tella Wormington		I disagree with the minimum for 2 bedroom flats in Town Centre, as these will likely either be 2 or more adults sharing or families, neither	Table 1, Page 4. In my view 2 bedroom flats in Town Centre should have 1 space not 0.75, as these will likely either be 2 or more	<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the</p>

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			<p>of which are realistically going to require less than one vehicle.</p>	<p>adults sharing or families, neither of which are realistically going to require less than one vehicle. There is a difference between car ownership and car use. Adults living in the town centre may use their cars less, but will still own cars as they require them for certain journeys /uses. It is unrealistic to assume otherwise.</p>	<p>requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p>National planning policy states that parking standards should take into account both development types and local car ownership levels. The evidence indicates that levels of car ownership generally correspond with household size and number of habitable rooms and bedrooms. Our minimum standards reflect this evidence and consequently lower levels of provision in flatted developments are considered appropriate.</p> <p>National planning policy states that local parking</p>
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Consultation Responses
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					<p>standards should take into account the accessibility of development as well as the availability of and opportunities for public transport, together with local car ownership levels. The evidence indicates that all of these factors should result in a lower minimum standard in Epsom Town Centre.</p> <p><i>Suggested Actions:</i> None</p>
19	Mr Cyril Frazer	Epsom Club	Have read the policy proposals and believe it is the right level of parking for Houses in order to endeavour to restrict the level of on street parking that is now becoming a real problem for residential roads, especially when you have vans parked outside you house that completely blocks a safe exit by car from ones property.	I don't know what current policies now exist regarding permitted development. When these Parking Policies are introduced, will there be any way that spaces provided for parking alongside a house are not eventually utilized for a Permitted Development that could then reduce the parking spaces provided. This has occurred in the past at many semi-detached and single houses. Don't know what the policies are for retirement homes parking, was at one time only provided on the basis of One Space Per Unit of accommodation. If that is still the case this is	<p><i>Response:</i> Support welcomed. The Council's ability to restrict Permitted Development Rights is limited, but it may be possible to consider this course of action on a case-by-case basis via planning condition where justified.</p> <p>Care homes falling under the C2 Use Class will be assessed on an individual basis as site specific factors will determine the appropriate level of parking provision for these uses. Retirement flats</p>

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				probably too low now as I know several people moving into such accommodation and still have cars. This will be a particular case in the development of the former Organ Inn site by McCarthy and Stone. In my road, Elmwood Drive if inadequate parking is provided it will exacerbate the problem when we already have the Honda Garage employees parking during the day.	falling under the C3 Use Class will be assessed in line with the proposed minimum standards. <i>Suggested Actions:</i> None
20	Mr Charles Muriithi	Environment Agency	Thank you for consulting the Environment Agency on the above. Where car parks are built in new residential developments, we recommend use of Sustainable Drainage Systems (SUDs) to reduce the risk of surface water flooding, ground water and land contamination. We would support proposals to minimise the area of impermeable paving and maximise soft landscaping. We would welcome the Council to seek to restrict permitted development rights for forecourt parking where surface water flooding issues exist. New residential development should incorporate flood protection measures where appropriate and		<i>Response:</i> The Council's ability to restrict Permitted Development Rights is limited, but it may be possible to consider this course of action on a case-by-case basis via planning condition where justified. <i>Suggested Actions:</i> None. It is considered that references to flood protection measures, permeable materials, soft landscaping and SuDS are best contained in the revisions to the Sustainable Design SPD, which considers all forms of development and is currently

Consultation Responses
Draft Parking Standards for Residential Development SPD 2015

			support the requirement for the base and finished surface to be laid at a slight gradient and be of a permeable material, to allow the satisfactory drainage and absorption of rainwater. It will be essential that SUDS are properly planned at the onset of planning for new development. Developers and their design teams need to take into account different factors including the layout of the site, topography and geology when planning and positioning the different SUDS elements. This information will be required for both outline and full applications so it is clearly demonstrated that the SUDS can be accommodated within the developments that are proposed.		being consulted upon.
21	Mrs Katharine Harrison	Surrey County Council	Thank you for consulting Surrey County Council on the Epsom and Ewell Draft Parking Standards consultation. I can confirm that we consider these standards to be reasonable in the light of the surveys and background study that Borough Council have undertaken and have no further comments to make.		<p><i>Response:</i> Support welcomed.</p> <p><i>Suggested Actions:</i> None.</p>

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