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Legal and Democratic Services

LICENSING AND PLANNING POLICY COMMITTEE

Thursday 23 January 2020 at 7.00 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 David Reeve (Chair)
Councillor Clive Woodbridge (Vice-Chair)
Councillor Monica Coleman
Councillor Neil Dallen
Councillor Chris Frost
Councillor Liz Frost
Councillor Rob Geleit
Councillor Lucie McIntyre
Councillor Julie Morris
Councillor Humphrey Reynolds

Yours sincerely



Chief Executive

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

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- You should proceed calmly; do not run and do not use the lifts;
- Do not stop to collect personal belongings;
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- Do not re-enter the building until told that it is safe to do so.

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Written questions must be submitted to the Council's Chief Legal Officer, who can be contacted via the following email address: Democraticservices@epsom-ewell.gov.uk. The written question must arrive by noon on the tenth working day before the day of the meeting. For example, for a meeting on a Tuesday, the request must therefore arrive by noon on the Tuesday two weeks before the meeting.

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 Servicers Officer before the meeting begins if they wish to ask a verbal question to the Committee.

2. 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.

3. 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 14 November 2019 (attached) and to authorise the Chairman to sign them.

4. ANNUAL MONITORING REPORT 2018-2019 (Pages 9 - 50)

The Committee is asked to note the contents of the Annual Monitoring report

5. HOUSING DELIVERY TEST 2019 (Pages 51 - 56)

The Committee is asked to note the forecasted result for Epsom & Ewell in the Government's forthcoming Housing Delivery Test for 2019 and the implications that this will have on the local planning authority's plan-making and decision taking processes.

6. LOCAL PLAN DESIGN POLICIES (Pages 57 - 184)

The Committee is requested to note the publication of the National Design Guidance and associated 10 characteristics used when assessing and determining planning applications. The Committee is furthermore requested to agree the extent of proposed draft policies being prepared for the Regulation 18 consultation for the draft Local Plan.

7. BIODIVERSITY: LOCAL PLAN BACKGROUND PAPER (Pages 185 - 224)

The Committee is asked to note the content of the Biodiversity Background Paper and subject to any additions or amendments, endorse the approach as set out in section 8.0 for the preparation of the emerging Local Plan.

8. LOCAL PLAN EVIDENCE BASE: SPATIAL ECONOMIC DEVELOPMENT STRATEGY (Pages 225 - 260)

The Committee is asked to note the contents of the Spatial Economic Development Strategy 2020 as a technical study that will form part of the evidence base for the emerging new Local Plan.

9. RACE TRAINING & EQUESTRIAN INDUSTRY: LOCAL PLAN BACKGROUND PAPER (Pages 261 - 280)

The Committee is asked to note the contents of the Scoping Report on the Racecourse and Equestrian Sector as a technical study that will form part of the evidence base for the emerging new Local Plan.

10. LOCAL PLAN EVIDENCE BASE: RETAIL NEEDS ASSESSMENT AND TOWN CENTRES HEALTH CHECKS (Pages 281 - 396)

The Committee is asked to note the contents of the Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks as a technical study that will form part of the evidence base for the emerging new Local Plan.

11. REVISED LOCAL PLAN PROGRAMME (Pages 397 - 416)

The Committee is asked to consider and approve the draft Local Plan Programme 2020.

Minutes of the Meeting of the LICENSING AND PLANNING POLICY COMMITTEE held on 14 November 2019

PRESENT -

Councillor David Reeve (Chair); Councillor Clive Woodbridge (Vice-Chair); Councillors Kate Chinn (as nominated substitute for Councillor Rob Geleit), Monica Coleman, Neil Dallen, Chris Frost, Liz Frost and Humphrey Reynolds

In Attendance: Councillor Nigel Collin and Councillor Eber Kington BA Cert Ed (From 19.25)

Absent: Councillor Rob Geleit, Councillor Lucie McIntyre and Councillor Julie Morris

Officers present: Amardip Healy (Chief Legal Officer), Ruth Ormella (Head of Planning), Karol Jakubczyk (Planning Policy Manager) and Sandra Dessent (Committee Administrator)

17 QUESTION TIME

No questions were submitted or were asked at the meeting by members of the public.

18 DECLARATIONS OF INTEREST

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

19 MINUTES OF PREVIOUS MEETING

The Minutes of the Meetings of the Licensing and Planning Policy Committee held on 12 and 23 September were agreed and signed by the Chair as a true record, subject to the addition of a reference to 23 September Minutes regarding the substitute Vice-Chair, Councillor Christ Frost who was elected for the evening in the absence of the Vice-Chair Councillor Clive Woodbridge, and with the agreement of the committee.

20 STATEMENT OF COMMUNITY INVOLVEMENT 2019

In June 2019 the Committee approved a draft Statement of Community Involvement (SCI) for the purpose of the public consultation. Following the conclusion of the public consultation the Committee received a report providing an overview of the responses submitted to the consultation and the proposed changes.

24 responses had been received and detailed in Annex 1. From the responses received the following amendments were suggested and agreed by the Committee:

a) Page 8: Paragraph 2.4.2. Remove 'both thematic and site specific'.

b) Page 12: Paragraph 2.7.3. Add 'hard to reach' before groups.

c) Page 12: Paragraph 2.7.3 Add 'For example a spoken word version of a consultation document for the visually impaired can be produced and for public exhibitions we will ensure that the consultation premises are fully accessible'.

d) Page 13: Paragraph 2.8.3. Add 'For example for young people it may be preferred to take the consultation to meeting places such as the sixth form or college.'

e) Page 15: Remove three duplicate paragraphs 3.3, 3.3.2, and 3.3.3

f) Appendix 1: Add after 'Older persons groups' a bracket (For example Age Concern and local care homes)

Accordingly, the Committee:

(1) Agreed the proposed amendments to the Statement of Community Involvement

(2) Agreed to adopt the Statement of Community Involvement and publish on the Epsom & Ewell website, along with the adoption statement.

21 LOCAL PLAN - GROWTH AND HOUSING STRATEGY

The Committee received a report setting out Six Principles aimed at shaping the strategic direction for the Borough's housing and growth. It sought to clarify key matters that were relevant in the production of Epsom & Ewell's new Local Plan. It was emphasized that the principles were a set of markers that would drive growth in the Borough, but not intended to explain how it would be achieved.

The report also set out a chronological list of the evidence that had been produced to inform the preparation of the Local Plan

The following points were raised:

- **Principle 1 – Character of the Borough:** The National Planning Policy Framework (NPPF) should be viewed as a whole when assessing plans for development. Whilst the NPPF specifies sustainable development, quality, character and design were also important and should be considered in the decision making process.

- **Principle 3 – Design:** It was reiterated that the Local Plan covered the whole borough and to that end it was agreed to amend Principle 3 to read; '…which ensures that each development is 'of ***Epsom & Ewell***' reflecting the local character and setting.'

- **Principle 4 – Heights and Density**: Further clarity on specific sites and localities would be achieved following Regulation 18 consultation.

- A Strategic Viability Assessment would provide the evidence needed to ascertain an achievable level of affordable housing. It was noted that developments of 10 or less units were not required to supply affordable housing.

- New Local Plans were required to meet the tests of soundness and produce a strategy for achieving the Objectively Assessed Housing Need (OAHN) target as a minimum. A strategy that resulted in an unmet OAHN would need to demonstrate how the unmet need would be delivered, for example investigating the potential for neighbouring Boroughs to take up the deficit.

- The purpose of Statements of Common Ground was to provide evidence that the Council had engaged with neighbouring Boroughs to explore the potential to work together to achieve their OAHNs and they could include areas of both agreement and disagreement.

- A key part of the Local plan would be the infrastructure development to support growth, and as part of the evidence a Transport Strategy would be produced to help secure and reinforce opportunities to improve infrastructure.

Accordingly the Committee:

(1) Agreed the Six Principles setting the strategic direction for Epsom & Ewell's new Local Plan growth Strategy, subject to the agreed amendment to Principle 3 as detailed above.

(2) Agreed to revisit the principles in light of any further changes relating to the National Planning Policy Framework (NPPF) or new evidence coming forward through the Local Plan process

The meeting began at 7.00 pm and ended at 7.40 pm

COUNCILLOR DAVID REEVE (CHAIR)

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ANNUAL MONITORING REPORT 2018-2019

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annexe 1: Annual Monitoring Report 2018/19
Other available papers (not attached):	

Report summary

The Annual Monitoring Report assesses the performance of adopted planning policies and tracks the progress against the Local Plan Programme. This document meets the requirements set out in national planning policy for producing a housing delivery trajectory and five year housing land supply statement. It also has an important role in informing the preparation and production of the emerging new local plan.

Recommendation (s)

That the Committee note the contents of the Annual Monitoring Report.

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

1.1 The delivery and implementation of the Epsom & Ewell Local Plan contributes towards all of the Council's Key Priorities. Meeting housing need, whether market or affordable, lies at the heart of the Local Plan. Accurate monitoring of our housing delivery performance helps to ensure that new policies and other interventions contribute towards meeting the needs of our communities and by doing so will assist in the achievement of the Council's Key Priorities.

2 Background

2.1 The Annual Monitoring Report (AMR) is prepared for each financial year (April – March). Our latest AMR covers the period 1st April 2018 to 31st March 2019. It is the principal means of monitoring the performance and implementation of our Local Plan, and is fundamental to providing a sound factual basis for decision-making and plan preparation.

2.2 Monitoring is an essential element of the 'Plan, Monitor and Manage' approach to policy making. With its focus on the delivery of sustainable development and sustainable communities, monitoring is important in the planning system in providing a check on whether those aims are being achieved. The targets and indicators in this report relate to the key policies set out in the Core Strategy 2007, Plan E (Epsom Town Centre Area Action Plan) 2012 and the Development Management Policies 2015.

2.3 National planning policy requires that local planning authorities must identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. In addition national policy highlights the importance of evidence in the preparation of policy, and the AMR provides an important resource to support that objective.

2.4 National policy also emphasises the importance of an up-to-date Local Plan. The AMR serves as a tool to show where policies are underperforming and where action needs to be taken to bring them up to date.

3 Main headlines

3.1 This year 165 new dwellings have been completed. This equates to just 28% of our identified housing need[1] for the year.

3.2 A housing trajectory has been prepared to estimate future housing delivery and provide a projection of whether there is likely to be a future shortfall or surplus of housing in relation to our housing requirement. The latest housing trajectory indicates that there will be a shortfall of 8,484 housing units over the period 2017-2037.

3.3 In addition, the AMR also sets out our 'Statement of five year housing land supply'. This identifies that there will be a shortfall of housing sites. It concludes that we currently have between a 1.1 year and 1.3 year supply of housing[2].

3.4 During the reporting period there have been 46 affordable housing completions. This equates to 28% of housing completions for the year, which is below the target currently set out in the Core Strategy. In response we have commissioned a Strategic Viability Assessment that will consider the scale of Affordable Housing that can be viably delivered through the new Local Plan. In order to be in accordance with national planning policy our new affordable housing policy will need to strike a balance between ensuring development remains viable and meeting our affordable housing need.

[1] As required by national planning policy this is set against the scale of objectively assessed housing need calculated through the government's standard method.
[2] National planning policy requires that local planning authorities identify at least a five year supply of housing.

3.5 Other Local Plan Policies that perform well at planning appeal include the Green Belt policies and housing standards/ design polices. Our new Local Plan will need to carefully consider the detailed design policies in light of the increased pressure on housing delivery.

4 Financial and Manpower Implications

4.1 The preparation, publication, examination and on-going monitoring of our new Local Plan is a high priority which is being resourced through the Planning Policy Team.

4.2 ***Chief Finance Officer's comments:***

5 Legal Implications (including implications for matters relating to equality)

5.1 The Planning and Compulsory Purchase Act 2004 introduced a requirement for local planning authorities to make an annual report to the Secretary of State about the implementation of the local development scheme and the extent to which the policies set out in the local plan were being achieved. This was referred to as an Annual Monitoring Report, which had to be published as a single document on a specific date.

5.2 However, section 113 of the Localism Act 2011 amended this requirement, renaming the report the Annual Monitoring Report (AMR), allowing it to be published annually rather than on a specific date, and removing the requirement for it to be a single report. This gives local authorities the flexibility to publish a number of component documents when information becomes available, which together make up the AMR.

5.3 The minimum information an AMR should contain is defined in Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It should:

5.3.1 Set out progress with local plan preparation.

5.3.2 Report on activities relating to the duty to cooperate.

5.3.3 Describe how the implementation of policies in the local plan is progressing.

5.4 Reports may also provide other information, for example, how contributions made by development have been used, such as planning obligations, the community infrastructure levy and new homes bonus payments.

5.5 Local planning authorities must publish information at least annually and it must be available publicly.

5.6 ***Monitoring Officer's comments:*** *none arising from the contents of this report.*

6 Sustainability Policy and Community Safety Implications

6.1 None for the purposes of this report.

7 Partnerships

7.1 None for the purposes of this report.

8 Risk Assessment

8.1 We are required by government to produce an annual monitoring report reporting on the performance and delivery of our Local Plan.

8.2 The implication of the absence of a five year housing land supply is significant when considering planning applications but is not a new situation for the Council. For clarity, national planning policy requires that in the absence of a demonstrable five year housing land supply, the presumption in favour of sustainable development applies.

8.3 The shortfall in projected housing units identified in the housing trajectory for the plan period is a significant headline for the new Local Plan and will be considered in the next Local Plan consultation. For clarity, national planning policy requires that new local plans are positively prepared; namely, that they propose strategies, policies and site allocations that meet local housing requirements in full.

9 Conclusion and Recommendations

9.1 That the Committee note the contents of the Annual Monitoring Report and that it will be subsequently be published on our website.

Ward(s) affected: (All Wards);

1st April 2018-31st March 2019

Annual Monitoring Report

Epsom & Ewell Annual Monitoring Report
1st April 2018- 31st March 2019

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Introduction

1.1 This Annual Monitoring Report (AMR) covers the period 1st April 2018 to 31st March 2019. It is the principal means of monitoring the implementation of the Epsom & Ewell Local Plan and is fundamental to providing a sound factual basis for decision-making and plan preparation.

1.2 Every Local Planning Authority is required under Regulation 34 of the Town and Country Planning (Local Planning) Regulations 2012 to produce and publish an Annual Monitoring Report at least once a year. The Regulations set out the minimum requirements for the contents of an AMR including progress with Local Plan preparation; how the implementation of policies in the Local Plan are progressing; net additional dwellings, net additional affordable dwellings; Community Infrastructure Levy receipts; and action taken under the duty to co-operate. It is then a matter for each Local Planning Authority to decide what additional information to include over and above the prescribed minimum information.

1.3 Monitoring is an essential element of the 'Plan, Monitor and Manage' approach to policy making. With its focus on the delivery of sustainable development and sustainable communities, monitoring is important in the planning system in providing a check on whether those aims are being achieved. The targets and indicators in this report relate to the key policies set out in the Core Strategy 2007, Plan E (Epsom Town Centre Area Action Plan) 2012 and the Development Management Policies 2015. Where data is available, trends are shown to help identify the need for further action and consequently the need to amend or delete policies in the Local Plan review. Some targets and/or indicators have been amalgamated or updated to reflect progress that has already been made on the new Local Plan and current monitoring arrangements. Some indicators that have been shown to be unquantifiable through previous AMRS have been omitted.

1.4 The National Planning Policy Framework published in 2012 and revised on 24th July 2018, sets out the government's planning policies for England and how these are expected to be applied. The Borough's new Local Plan will be in conformity with this and together they will form the planning policies for the Borough. The new Local Plan will replace all current local planning policies.

1.5 This AMR is presented under the following sections:

- The Borough in Context
- Current and Emerging Statutory Development Plan for the Borough.
- Progress and Implementation of the Local Plan
- Duty to co-operate
- Housing Delivery
- Infrastructure and Developer Contributions
- Economic development (including employment, retail and Plan E)
- The built environment
- Green Infrastructure and the environment

The Borough in Context and Future 40[1]

2.1 Epsom & Ewell is the smallest Surrey Borough situated on the northern boundary of the county; with Greater London lying to the north; comprising an area of just over 3,400 hectares. The population currently sits at approximately 80,000, making Epsom and Ewell the most densely populated borough in Surrey with approximately 23.32 persons per hectare.

2.2 The Borough is well connected with accessible road links to the M25 and A3 trunk roads and central London less than 30 minutes away by train. There are four train stations in the Borough. Both London Heathrow and Gatwick airports are located within easy reach. Despite being adjacent to London, the Borough is proud of its large open green spaces including Epsom Downs (home of Epsom Racecourse), Epsom Common and Nonsuch Park. Although small in size, the borough is home to a number of major national and international business headquarters through to small independent enterprises. It is also home to education establishments including the University for the Creative Arts and Laine's Theatre Arts.

2.3 There are approximately 32,400 dwellings in Epsom and Ewell. Of these, approx. 92% are privately owned, 8% private rented and 0.1% are social rented. The percentage of private sector properties owned in the Borough is higher than the equivalent average for Surrey (88.4%) and nationally (82.6%). In December 2018 the mean house price in the Borough was £521,741, and the median price was £472,500. (ONS, HM Land Registry). The mean price in Epsom & Ewell is generally slightly lower than the mean across Surrey, and the median is slightly higher. Full statistics are available here.

2.4 Future 40 is a Council led initiative to develop a long-term vision for Epsom & Ewell. As part of this work a 'Borough Profile' has been compiled that provides a really useful summary of the statistical data available for the Borough. This is available on the Future 40 website here. More detail on Future 40 can be found at www.future40.org.

The Current and Emerging Statutory Development Plan for the Borough

Current Local Plan

3.1 The Development Plan for the Borough is comprised of the following documents:

The Local Plan
- Epsom & Ewell Core Strategy 2007
- Plan E Epsom Town Centre Area Action Plan 2011
- Upper High St, Depot Rd and Church Street Development Brief 2012
- Revised Developer Contributions SPD 2014
- Epsom & Ewell Development Management Policies Document 2015
- Parking Standards for Residential Development 2015
- Revised Sustainable Design Supplementary Planning Document (SPD) 2016

Surrey-wide Documents
- Surrey Waste Plan 2008
- Surrey Minerals Plan Core Strategy 2011

[1] The data included in this section was accurate at 1 December 2018- ONS Census Date 2011, DCLG 2017 Via Surrey i

3.2 In addition to the above documents we have also prepared and produced a number of useful and valued supplementary planning guidance documents. These support the policies and proposals of the Local Plan. Such additional local guidance is considered necessary and for that reason is believed to be consistent with national planning policy. The main role of these documents is to clarify and support local policy and it may be taken into account as a material consideration in relation to the determination of planning applications. These include the following documents:

- Single plot and other types of residential infill development 2003
- Householder Applications 2004
- Solar Panel Guidance for Domestic Installation 2011
- Biodiversity and Planning in Epsom & Ewell 2012
- Shopfront Design Guide 2012

3.3 In order to respond to the higher objectively assessed housing need calculated using the government's standard methodology and Housing Delivery Test we are preparing a new Local Plan that will include new strategic, general and site allocation policies that seek to meet as much of our housing requirement as is sustainably possible without harming the qualities that make the Borough special. As part of this process we have commissioned the preparation of a 'Masterplan' for Epsom & Ewell, which will explore how much additional growth the Borough can sustainably accommodate. This document will initially function alongside our emerging Local Plan – providing supporting evidence and information during the examination in public process. We anticipate that following the adoption of our new Local Plan it could be further developed to serve as a supplementary planning framework that contributes towards the growth of the Borough into the 2040s. We have also published a document entitled 'Making the Efficient Use of Land Optimising Housing Delivery 2018'. This is an interim measure to boost housing delivery and give greater certainty to the local plan process. This document sets out how we will consider the issue of meeting our housing requirement when set within the context of our existing adopted Local Plan policies that relate to building height and housing density when determining planning applications.

3.4 We anticipate that the design-related supplementary guidance contained within the above documents will be reviewed and a new Design Guide will be produced. The new supplementary planning guidance may take the form of a design code for the Borough. It is envisaged that such guidance could support the delivery of high quality sustainable development during the new Local Plan period. It will be prepared to function alongside the national design guidance.

Emerging Local Plan

3.5 We anticipate that the new Epsom & Ewell Local Plan will cover the following components:

- Appropriate growth and housing strategies that responds to the government's assessment of objectively assessed housing need
- Revision of the Borough wide housing target to take account of objectively assessed housing need; taking account of the relevant constraints affecting the ability of the development industry to deliver of growth
- An appropriate infrastructure strategy that responds and complements the scale of new housing identified by the government's assessment of objectively assessed housing need. This will seek to bridge the gaps in capacity and funding that currently serve to constrain the necessary scale of new housing delivery required to meet the government's assessment of need
- An overview of how the Borough Council could work with its housing market area partners to address unmet need
- A Strategic review of the Green Belt
- A review of our affordable housing delivery policy
-
- A review of those existing policies that may impede our ability to respond positively to the government's objectively assessed housing need calculation. Policies under consideration for review include those relating to building height, housing density, housing mix and parking standards.

3.6 The new Local Plan will also include new site allocation policies relating to:

- Green Infrastructure
- Major developed sites within the Green Belt
- Housing delivery
- Employment sites
- Retail centres
- Epsom General Hospital
- The University for the Creative Arts
- Transport networks

Progress and Implementation of the Local Plan

4.1 We published a revised Local Plan Programme in June 2018. This succeeds the June 2017 Programme and focuses on the preparation and production of the new Local Plan. This section of the AMR provides an outline assessment against this June 2018 Programme.

4.2 This Local Plan Programme identifies and allocates proportionate resources to each project and identifies any risks and constraints that we can foresee. The programme sets out the following for progressing the Local Plan review-

Local Plan Production

Key Stages	*Planned Date*	*Actual progress*
Issues & Options Consultation (Call for Sites)	September – November 2017	September- December 2017
Consideration of Consultation Responses	December 2017	December 2017- March 2018
Preparation and production of the Masterplan for Epsom & Ewell	June 2018- June 2019	June 2018- June 2019 (On track)
Preparation of the Epsom & Ewell Duty to Co-Operate Engagement Plan	September- October 2018	September- October 2018
Final Issues and Options Consultation (Regulation 18 part 2)		October- December 2019
Pre-Submission Public Consultation	October- November 2019	Now expected March – May 2020.
Date of Submission to Secretary of State	December 2019	Now expected June 2020
Pre-Examination Meeting	January/ February 2020	September 2020
Public Hearing	March/ April 2020	December 2020
Estimated Date for Adoption	June 2020	December 2021

4.3 The Local Plan Programme also identifies a timetable for the production of the key evidence base documents that support and inform the process. These evidence base documents are listed below.

Evidence Base Studies

Documents	Publication Dates	Progress 18-19
Strategic Housing Market Assessment2	October 2016	Published Oct 16
Green Belt Study Stage 1	February 2017	Published Feb 17
Strategic Housing Land Availability Assessment	July 2017	Published June 17
Traveller Accommodation Assessment	July 2017	Published June 2017
Constraints Study	July 2017	Published June 17
Strategic Flood Risk Assessment Update	June 2018	Published June 2018

2 Prepared in partnership with Royal Borough of Kingston, Elmbridge and Mole Valley Borough Councils.

Green Belt Study Stage 2	July 2018	Published July 18
SHMA version 2		To be published September 2019
Transformation Masterplan		To be published September-October 2019
Duty to Co-Operate Position Statement	June/ July 2019	To be published October 2019
Indoor and outdoor Sports Facilities Assessment and Playing Pitch Strategy		To be published January 2020
Open Space Audit Review		To be published January 2020
Retail Needs Assessment		To be published January 2020
Spatial Economic Development Strategy		To be published January 2020
Strategic Viability Assessment	June/ July 2019	To be published January 2020
Habitats Regulations Assessment		April 2020

Duty to Co-Operate

5.1 Section 110 of the Localism Act 2011 sets out the duty to co-operate and requires authorities to "engage constructively, actively and on an on-going basis". It seeks to ensure that local planning authorities lead strategic planning through their Local Plans, addressing social, environmental and economic issues that can only be addressed effectively by working with other local planning authorities beyond their own administrative boundaries. Local planning authorities must give details of what actions they have taken under the duty to co-operate to their communities in their Annual Monitoring Reports. The revised National Planning Policy Framework places an enhanced emphasis on local authorities working together to deliver sustainable growth. The Framework states that meaningful engagement with our neighbours will be of critical importance to our new Local Plan being found sound.

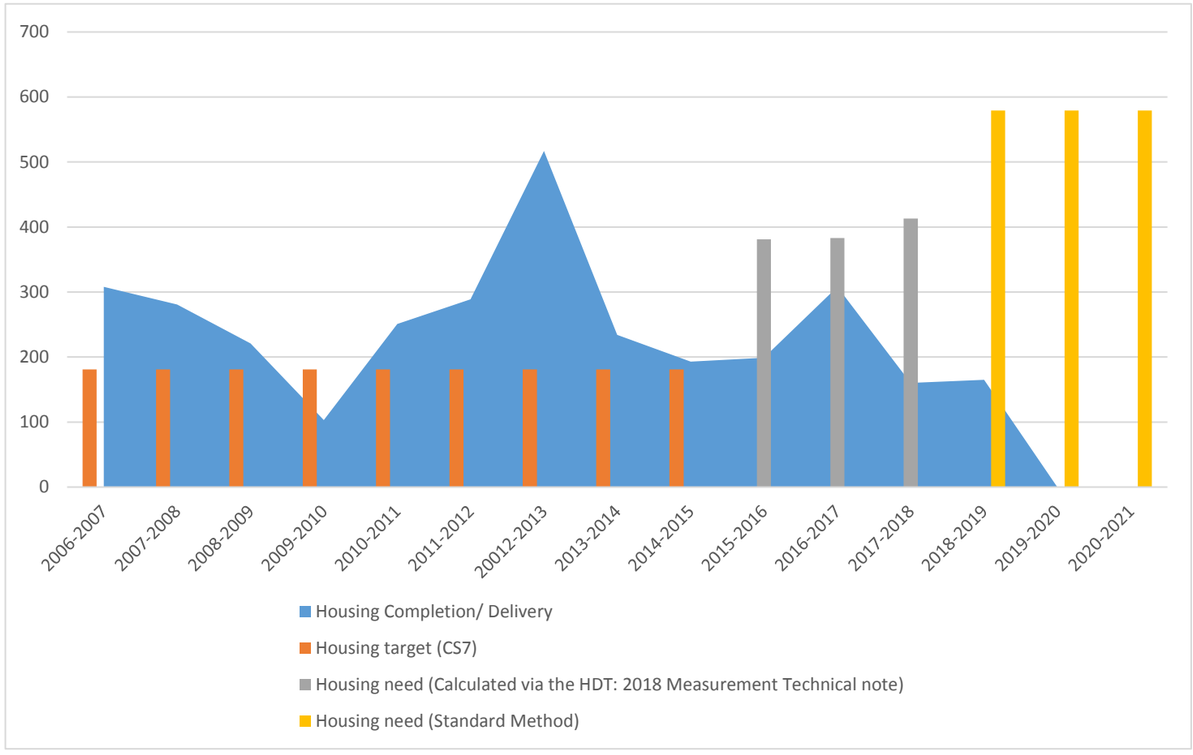
5.2 In November 2018 the Licensing and Planning Policy Committee received a report setting out our approach to further developing strategic relationships with neighbouring boroughs. This includes a plan of engagement with neighbouring planning authorities and an agreement from the Committee to the actions listed in the report. Securing agreed statements of common ground with our neighbours will be a positive step forward in demonstrating that we are meeting the duty-to-co-operate. Further details of actions we will take in the preparation of the Local Plan are contained in the report.

5.3 During the reporting period the Borough Council has continued to participate in a number of Surrey-wide initiatives that contribute, at the strategic level, to the local plan making process. This work has been undertaken through a variety of Surrey-wide bodies that include Surrey Leaders; Surrey Chief Executives; Surrey Futures; Surrey Planning Officers Association and the Surrey Planning Work Group – the latter being fully focused upon local plan making. We have met and engaged with all of our neighbouring planning authorities, including the Greater London Authority. We continue to ensure that we maintain an appropriate dialogue with our neighbours and we are keeping up to date with their Local Plan progress.

Housing Delivery

Policy	Existing Indicators and Targets	Performance	Analysis
CS7	**Number of (net) housing completions per annum** The Core Strategy target has long been out of date. The scale of Objectively Assessed Housing Need (OAHN), calculated using the standard methodology as required by the latest National Planning Policy Framework is calculated as **579** units per annum. A 20% buffer has been added to this figure due to under performance, resulting in a requirement of **695**	**165** new dwellings have been completed this year. Housing delivery has been on average **248** dwellings per annum since 2006.	This year we have achieved 28% of our identified housing need. This is the lowest level of delivery since the monitoring period began. Historic peaks in delivery during 2012/2013 and 2016/2017 can be explained by a number of completions on strategic housing sites on the West Park and St Ebbas (known as Hospitals cluster) sites in 2012/13 and the redevelopment of the former Linton's Centre site between 2016/17. We have consistently exceeded the housing target identified under Core Strategy Policy CS7. However, the target identified in the Core Strategy has been superseded by the OAHN, calculated by the standard method (579 dwellings per annum) introduced by the publication of the revised NPPF. Our OAHN figure is a substantially higher level of housing delivery that we have not previously achieved in any given year before. The revised National Planning Policy Framework (NPPF) has also introduced a number of new tests/measures that seek to increase housing delivery. This includes the Housing Delivery Test and its associated penalties. These are measures which are subject to a three year transitional period whereby either the need calculation or the thresholds are stepped up every year. This can be seen represented in Figure 1. We are working on a new Local Plan that will encompass all of the housing policies and allocate new housing sites. This will be informed by detailed evidence base documents including the Strategic Housing Land Availability Assessment (June 2017) and the Strategic Housing Market Assessment 2019. A full list of housing completions for 2018-19 can be found in appendix A

Figure 1: Housing delivery rates compared with identified housing need.



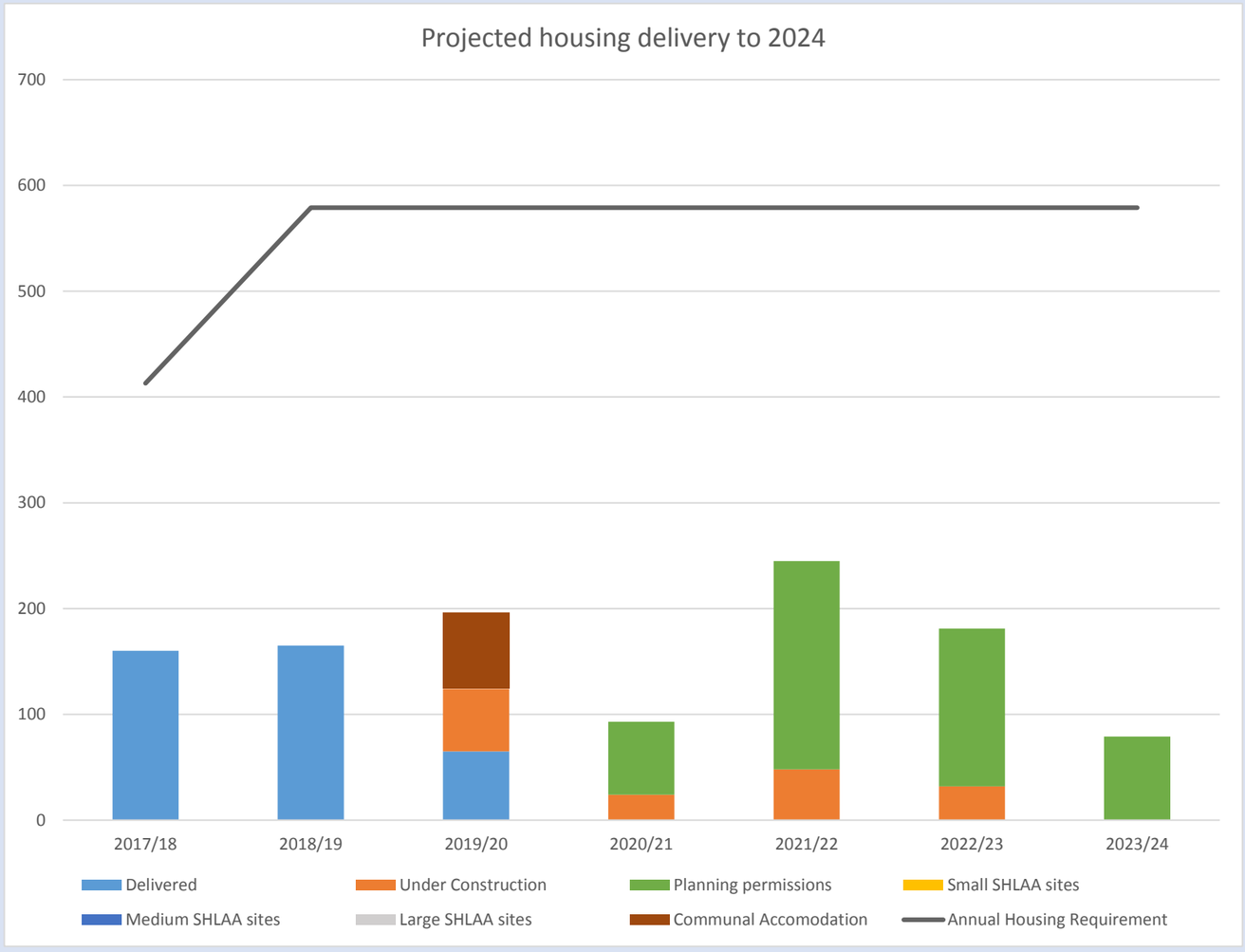
CS7	Detailed Housing Trajectory projecting the net additional dwellings in future years. Mapping housing trajectories provides a useful approach for assessing the performance of housing delivery. Such an approach helps to support the 'plan, monitor, manage' concept. The housing trajectory illustrates past performance and estimates future delivery, thus enabling an assessment to be made of whether there is likely to be a future shortfall or surplus of housing in the Borough in relation to the housing targets. The NPPF requires local planning authorities to prepare a robust evidence base on housing need and demand through the preparation of a Strategic Housing Market Assessment (SHMA), and land availability through a Strategic Housing Land Availability Assessment (SHLAA). Additional emphasis is placed upon the need to identify and annually update a supply of deliverable sites sufficient to provide at least 5 years' worth of housing supply against their housing need. In addition, local planning authorities are advised that they should identify a supply of specific, developable sites or broad locations for growth, for the following 6-10 years and where possible 11-15 years. To illustrate the expected rate of market and affordable housing delivery a housing trajectory for the plan period is suggested. The Borough's housing land supply and housing trajectory are derived from the following sources: □ Past housing completion figures from 2017-2019 □ Number of units currently under construction □ Unimplemented planning permissions □ SHLAA Opportunity sites (small medium and large) □ Windfall sites (as justified in the SHLAA 2017 and based on past delivery) □ Communal (C2) and student accommodation permitted (included in the Housing Delivery Test calculations from 2019 and calculated as below). The revised NPPF 2019 states that sites that have the potential to deliver housing during the first 5 years of the housing trajectory must meet the definition of 'deliverable' set out in national policy. In the Borough this means that the only sites that can be considered to be 'deliverable' in line with the NPPF are limited to: - sites that have planning permission that have not been implemented or that have commenced - sites allocated in Plan E- this is our only adopted local plan document that includes allocations at this time. (There are currently no Plan E sites that we believe will deliver housing in the first five years that do not already have planning permission) Housing sites that have been identified through the SHLAA 2017 process, that are considered to be 'developable' within the plan period are included within the trajectory from year 6 (these were classified as category 1, 2 or 3 sites). SHLAA sites that do not have planning permission and are not allocated in the Development Plan (Plan E) cannot be included in the five year supply as they are not considered to be 'deliverable'. These are shown separately in the housing trajectory to allow the Council to monitor the progress of these sites and to confirm whether the identified potential sources of supply are coming forward. The allocation of these sites will be considered through the new Local Plan. Since the changes to Planning Practice Guidance in March 2014, Class C2 residential units can now be counted towards the supply of new homes. This has been reconfirmed through the 'Housing Delivery Test Measurement Rule Book' July 2018. This states that the 'net homes delivered' includes; 'Net Homes Delivered in a Year' PLUS $\frac{\text{Net increase in bedrooms in student communal accommodation in LA}}{\text{Average number of students in student only households in England (2.5)}}$ PLUS $\frac{\text{Net increase in bedrooms in other communal accommodation in LA}}{\text{Average number of adults in households in England (1.8)}}$

On that basis we have included projected communal completions in our housing trajectory and have applied the calculation in line with the Housing Delivery Test.

The average number of units resulting from windfall sites with 1-4 units (net gain) is 31 per year for the last eight years (SHLAA 2017). The impact of the Development Management Policy DM16 is still unclear but is considered likely to have managed the number of new houses built in back gardens. With this in mind it is suggested that the figure of 31 is reduced by 12% in line with the average % of small windfalls that are classified as garden land developments each year. This takes the average number of windfalls on sites of 1-4 units to 27 per annum. A reduction in the number of the small windfalls coming forward should also be included as the possible windfall sites will inevitably reduce. A reduction to 20 units per annum is suggested for the last five years of the plan period.

The housing trajectory (Appendix B) shows a deficit of 8484 units over the plan period (2017-2037). The trajectory also demonstrates that we are currently unable to demonstrate a five year supply of housing and that we have around a 1.1- 1.3 years housing supply based on our Objectively Assessed Housing Need figure. This is set out in more detail in the 'Statement of five year Housing Land Supply' attached as Appendix C.

Figure 2: Projected housing delivery to 2024



<table>
<tr><th>Policy</th><th>Existing Indicators and Targets</th><th>Performance</th><th>Analysis</th></tr>
<tr>
<td>CS9</td>
<td>Number of affordable housing units completed per annum (and as a % of total net completions)

The Council has a target that overall, 35% of new dwellings should be affordable.

Using the standard methodology figure of 579 (2018 onwards) this equates to a figure of 203 per annum.</td>
<td>This year there has been 46 affordable housing completions. This equates to 28% of housing completions for the year.</td>
<td>
<table>
<tr><th></th><th>Open Market Housing</th><th>Affordable Units</th><th>Percentage</th><th>Total (gross)</th><th>Target/HDT need(total)</th><th>Affordable target</th></tr>
<tr><td>2018-19</td><td>119</td><td>46</td><td>28%</td><td>165</td><td>579</td><td>203</td></tr>
<tr><td>2017-18</td><td>136</td><td>23</td><td>15%</td><td>159</td><td>418</td><td>146</td></tr>
<tr><td>2016-17</td><td>251</td><td>57</td><td>19%</td><td>308</td><td>418</td><td>146</td></tr>
<tr><td>2015-16</td><td>107</td><td>102</td><td>49%</td><td>209</td><td>418</td><td>146</td></tr>
<tr><td>2014-15</td><td>142</td><td>58</td><td>29%</td><td>200</td><td>181</td><td>63</td></tr>
<tr><td>2013-14</td><td>203</td><td>77</td><td>28%</td><td>280</td><td>181</td><td>63</td></tr>
<tr><td>2012-13</td><td>315</td><td>207</td><td>40%</td><td>522</td><td>181</td><td>63</td></tr>
<tr><td>2011-12</td><td>220</td><td>73</td><td>25%</td><td>293</td><td>181</td><td>63</td></tr>
<tr><td>2010-11</td><td>213</td><td>49</td><td>19%</td><td>262</td><td>181</td><td>63</td></tr>
<tr><td>2009-10</td><td>64</td><td>46</td><td>45%</td><td>110</td><td>181</td><td>63</td></tr>
<tr><td>Total</td><td>1770</td><td>738</td><td>30%</td><td>2508</td><td>2919</td><td>1019</td></tr>
</table>

Over the past 10 years we have delivered 738 affordable units (of varied tenures) which equates to 30% of housing delivery. Our affordable housing shortfall for the last ten years is 281 units.

In the past we have struggled to deliver the affordable housing we need. Meeting our current target of 35% has been challenging. Our forthcoming Strategic Housing Market Assessment will provide a revised needs calculation. This may show an even higher need so it is very important that we carefully consider how we can deliver this in the future. We have commissioned a Strategic Viability Assessment that will consider the scale of Affordable Housing that can be viably delivered through the new Local Plan. We believe that any new affordable housing policy will need to strike a balance between ensuring development remains viable and meeting our affordable housing need.
</td>
</tr>
</table>

Our housing trajectory only identifies with certainty that an additional 80 affordable homes will be delivered. It is likely that more units will come forward through windfall sites but this will be limited.

Source of supply	2019/20	2020/21	2021/22	2022/23	2023/24
Delivered					
Planning Permissions		2			
NESCOT 2 (Sycamore Gardens)		29			
Presto Haulage, The Old Mill, Old Malden Lane				16	
Other communal accommodation- Former Salesians	13				
Epsom and Ewell High School					20
Total	13	44	0	16	20
Cumulative Total	13	44		60	**80**

Surrey County Council publish 'Surrey snapshots' on various topics on a regular basis. This includes one entitled 'What does the affordable housing profile of Surrey look like?' The most recent published snapshot is available here: Surrey I Snapshot data
This shows that according to the 2011 census Epsom & Ewell has the lowest proportion of households living in affordable housing in Surrey. This corresponds with our understanding of the intelligence that we have a slow turnover rate of socially rented properties that is compounded by past under delivery. It is important to note that this does not mean that we have a higher need than elsewhere.

Delivering affordable housing is likely to be identified as a corporate priority in the new Corporate Plan.

<table>
<tr><th>Policy</th><th>Existing Indicators and Targets</th><th>Performance</th><th>Analysis</th></tr>
<tr><td>DM21</td><td>Meeting Local Housing Needs

Number and type of units permitted for specialised forms of residential accommodation Percentage of planning appeals allowed overturning Council's decision

Self-Build and Custom Build Register</td><td>99 student rooms permitted

4 units for racehorse training workers</td><td>Proposals that delivered 99 student bedrooms were permitted during September 2018 at Sunnybank House, 39A East Street, Epsom (17/01755/FUL). This can be calculated as contributing 39 units towards our housing need using the formulae set out in the Housing Delivery Test guidance. This student accommodation is occupied by students from the University of the Creative Arts.

Four new units were permitted at Downs House (18/00288/FUL) for horse racing trainers and workers. Policy DM21 supports the provision of specialised forms of housing subject to the demonstration of need. In this case the applicants made a strong case that the trainers and workers were required to live on site and that there is currently a lack of suitable and affordable housing in the area. This accommodation is restricted to workers by a planning condition and cannot be sold or rented to third parties.

The Self Build and Custom Housebuilding Act 2015 introduced new duties on local authorities to keep, and have regard to registers of individuals and community groups, seeking land for the purposes of self or custom housebuilding. From 1 April 2016 we were required to assess demand for self and custom housebuilding and since end of 2017 we have submitted an annual return to the government indicating this demand. We are required by the Self Building and Custom Housebuilding Act 2015 to give planning permissions for enough suitable serviced plots of land to meet the demand for self-build and custom house building in Epsom and Ewell. This is not a requirement to provide a plot directly to each individual on the register. The level of demand is established by the number of entries added to the register during a base period. At the end of each base period, we have 3 years in which to give an equivalent number of planning permissions to plots of land, which are suitable for self- build and custom house building, as there are entries for that base period. A plot of land can also include land that currently has a property on it which the applicant intends to demolish and rebuild. From 1 April 2016 to 31 March 2019 there were 11 planning permissions granted for self-build plots. The 'level of demand from the base period 1 April 2016- 30 October 2016 was four. 30 October 2019 will mark the end of the first three year period since the first register base period.</td></tr>
<tr><td>DM22

Page 26</td><td>Housing Mix

% of planning permissions granted for four units or more, for development comprising 25% three bedroom or larger units</td><td>There were 12 permissions granted for 4 or more units this reporting year. Of these, one was PDCOU so out of the control of this policy and one was for student housing at Sunnybank House, East Street. Of the nine remaining, three comprised at least 25% 3 bedroom or larger units.</td><td>
<table>
<tr><th>Unit sizes</th><th>% 3 bed+</th></tr>
<tr><td>4Hx5B</td><td>100%</td></tr>
<tr><td>4H x 4B +</td><td>100%</td></tr>
<tr><td>8Fx1B 7F x 2B 4F x 3B 2Fx4B</td><td>29%</td></tr>
<tr><td>3Fx1B 4Fx2B 2Fx3B</td><td>22%</td></tr>
<tr><td>2Fx1B 3Fx2B 1Fx3B</td><td>17%</td></tr>
<tr><td>8Fx1B</td><td>0%</td></tr>
<tr><td>9Fx2B</td><td>0%</td></tr>
<tr><td>4Fx2B, 2Fx1B</td><td>0%</td></tr>
<tr><td>3Fx1B 4Fx2B</td><td>0%</td></tr>
<tr><td>6Fx1B 3Fx bedsit</td><td>0%</td></tr>
</table>
In an attempt to boost housing delivery, we published a new document 'Making efficient use of land optimising housing delivery' in May 2018. Although this document does not explicitly mention Policy DM22 it is reasonable to assume that if a site is being 'fully optimised to positively respond to our objectively assessed housing need' then higher density, smaller units are likely to be looked at more favourably than before.

There is also the overall capacity of the smaller sites coming forward with genuinely less space and the viability of delivering these sites.

The NPPF does state that market signals should be considered in determining planning applications. As we are seeking to optimise each site for housing delivery, this policy could be considered to be contrary to that approach. Indeed when making balanced decisions the Development Management process may consider that the need to deliver housing numbers through smaller units should be afforded more weight.

The revised SHMA will help inform the types and size of units likely to be needed in the borough in the future. This is likely to require a varied mix to broadly reflect the housing mix in the recent SHMA. In seeking to balance the future need and in the context of a high housing number, the policy should not be applied rigidly. A proposal that doesn't reflect this mix may be supported provided there are clear reasons for alternative mix. For example the location of the site may be more suitable for flatted scheme comprising of smaller units.</td></tr>
</table>

Policy	Existing Indicators and targets	Performance	Analysis
CS8	**Broad Location of Housing Development** % of housing completed on previously developed land (PDL) A map in Appendix E shows the location of housing completions this year	76% of housing completions this year were on PDL	Of the 165 housing completions this year, 126 of units were completed on Previously Developed Land (PDL). This equates to 76%. The 39 units on greenfield land include 37 at NESCOT Agricultural land, one house at Old Malden Lane and one small garden land site at Hyperion Place.
DM12	**Housing Standards** % of new housing developments, including conversions complying with external and internal space standards. All new housing (including conversions) to comply with external and internal space standards (set out in the forthcoming Design Quality SPD)	From our records/ audit of Development Management reports there are no new housing developments that do not meet our space standards	Policy DM12 is regularly stated as a reason for refusal due to unacceptable site layouts resulting in poor amenity space, the closeness of trees with the potential to cause unacceptable encroachment/ failing to meet the national minimum amenity standards set out in the technical guidance, failure to provide external amenity space, failure to provide adequate living standards and adequate internal amenity space. The Design Quality SPD will provide more guidance in the future. This policy is likely to remain a very important policy to ensure adequate sized units are being delivered as the pressure to provide more housing continues to increase. Permitted Change of Use to Residential (such as Office to residential) falls outside of the planning system and the space standards are harder to control. They are captured by Building Regulations which will hopefully ensure adequate living conditions.
DM13 and E7	**Building Heights** Number of planning permissions granted for higher buildings (above 12 metres) outside of the identified areas in the Town Centre Zero applications approved above the maximum height policy	Sunnybank House on East Street has been approved for a six storey building to replace the existing four storey office building on the site. This site falls within the Plan E 16 metre zone and the proposal stands at 18.1m tall.	In an attempt to boost housing delivery, we have published a new document 'Making efficient use of land optimising housing delivery' in May 2018. This was agreed by the Licensing and Planning Policy Committee. In this document we acknowledge that the height policies could serve to restrict the capacity of sites located within the existing built up areas. On that basis the Members of our Licensing & Planning Policy Committee have agreed to attribute greater weight towards the need to deliver new homes. This will inevitably include taller buildings. During February 2019 we commenced work on a Borough Wide Masterplan. The focus of the Masterplan is to assess and establish the capacity for sites and locations across the Borough to deliver new types of higher density housing development; in appropriate and sustainable locations. This includes taller buildings in some more sustainable locations. A future draft of the new Local Plan is likely to include a series of six strategic principles. One of these seeks to secure high quality design. This is likely to be a theme that that will run throughout the future new Local Plan but is unlikely to prescribe specific height restrictions in the same way as the current planning policies.
DM16	**Backland Development** Number of backland sites approved for development and applications approved resulting in the loss of garden land	One application was approved this year on garden land at Hyperion Place.	This application was considered to be policy compliant under the second part of the policy which sets out the 'exceptional cases'. We consider the contribution the swathes of small back gardens across the Borough make to the Green Infrastructure and character of the area to be an important part of the character of the Borough that should be protected. This policy is likely to be retained as part of the new Local Plan with some of the current details being included in the new Design SPD.
DM23	**Gypsy and Traveller Sites** Number of pitches provided for permanent gypsy and traveller accommodation and pitches for travelling showpeople against the requirements identified in the Traveller Accommodation Assessment	No new pitches have been provided for Gypsy and Traveller accommodation in the Borough.	In June 2017 we published a Traveller Accommodation Assessment. The Assessment identified a need for 27 pitches and zero Travelling Showpeople plots over the period 2017-2032. Of these 14 pitches are needed in the first five years to 2022. This equates to an annualised requirement of 1.8 pitches and zero plots. There is no identified need for transit accommodation over the period 2017-2032. However, upon application of the new planning definition, it was concluded that none of the need for new additional pitches is for 'Gypsies and Travellers'- as defined by National Planning Policy. As a consequence the Assessment identifies that there is no requirement for new additional pitches to meet the accommodation needs of the local Gypsy and Traveller communities. Nevertheless, the Borough Council has a duty to consider the accommodation needs of 'caravan dwellers' or 'non-travelling Gypsies' in the Borough. Consequently the pitch requirement identified should be considered within the Local Plan making process.

Infrastructure and Developer Contributions

<table>
<tr><th>Policy</th><th>Existing Indicators and Targets</th><th>Performance</th><th>Analysis</th></tr>
<tr>
<td>CS12</td>
<td>Developer Contributions to Community Infrastructure

‘All development to make good potential deficits’</td>
<td>We adopted the Community Infrastructure Levy (CIL) in 2014.This replaced S106 agreements for most infrastructure contributions apart from site specific mitigation and affordable housing. The CIL sets a ‘flat fee’ per square metre of floor area in new residential, convenience retail, student accommodation and care homes. The rate is index linked.

The Community Infrastructure Regulations state under Part 7 (Regulation 62 (4)) that a charging authority must prepare a report for any financial year that it collects CIL to ensure the Levy is open and transparent. The Regulations require that such a report must include the following information:
a) the total CIL receipts for the reported year;
b) the total CIL expenditure for the reported year;
c) summary details of CIL expenditure during the reported year including –
i. the items of infrastructure to which CIL (including land payments) has been applied,
ii. the amount of CIL expenditure on each item,
iii. the amount of CIL applied to repay money borrowed, including any interest, with details of the infrastructure items which that money was used to provide (wholly or in part),
iv. the amount of CIL applied to administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation; and
d) the total amount of CIL receipts retained at the end of the reported year.

This will be published on our website no later than 31st December following the end of the reporting year.</td>
<td>The CIL Reg 62 Report has now been published and can be viewed Here.

S106 money agreed
<table>
<tr><th>Address</th><th>Reference</th><th>Amount</th><th>Purpose</th><th>Agreement date</th></tr>
<tr><td>Land at 39A East Street</td><td>17/01755/FUL</td><td>£4,600</td><td>Travel Plan</td><td>17/9/18</td></tr>
<tr><td></td><td></td><td>£4,600</td><td></td><td></td></tr>
</table>
Units agreed through S106
<table>
<tr><th>Address</th><th>Reference</th><th>Purpose</th><th></th></tr>
<tr><td>101-111 Hollymoor Lane</td><td>18/00832/REM</td><td>Specifies the required tenure of the 20 affordable units on site</td><td>8/11/18</td></tr>
</table>
S106 money received
<table>
<tr><th>Address</th><th>Reference</th><th>Amount</th><th>Purpose</th><th>Funds Received</th></tr>
<tr><td>Land at 39A East Street</td><td>17/01755/FUL</td><td>£4,600</td><td>Travel Plan</td><td>1/3/19</td></tr>
<tr><td>The Chalk Lane Hotel</td><td>17/01275/FUL</td><td>£143,940</td><td>Affordable Housing Contribution</td><td>29/3/19</td></tr>
<tr><td>NESCOT</td><td>17/00429/FUL</td><td>£5,000</td><td>Bus Stop Improvements</td><td>5/2/19</td></tr>
<tr><td>Birchcroft and Hollydene, Court Lane</td><td>16/01145/FUL</td><td>£81,168.23</td><td>Affordable Housing Contribution</td><td>13/7/18</td></tr>
<tr><td></td><td></td><td>£234,708</td><td></td><td></td></tr>
</table>
</td>
</tr>
<tr>
<td>CS13 and DM34</td>
<td>Core Strategy Indicator: Net change in the type and number of community, cultural and built sports facilities provided each year within the Borough.

No net loss of community facilities</td>
<td>18/00568/COU 71 Stoneleigh Broadway- Change of use from A1 to D1 for the purpose of an adult and child Spanish tuition and cultural centre. PERMITTED

18/01060/COU 19 Upper High Street, Epsom - Proposed change of use from A1 to D1 (Tuition centre) PERMITTED

18/00716/FUL 10 East Street, Epsom-
Change of Use of to Education Centre (Use Class D1) from D1 (Medical) PERMITTED

18/00289/FUL 55-59 High Street, Epsom-
Change of use from B1 to D1 (dental surgery) PERMITTED

17/01378/FUL Horton Chapel:
Refurbishment and conversion of existing Chapel (Use Class D1) to an Arts and Performance Centre (Use Class D1 and D2) , including performance zone, creative learning , exhibition and cafe zone, new entrance glazed canopy, new 57 space car park parking access road; associated external works including soft and hard landscaping. PERMITTED</td>
<td>There have been no additional sports facilities permitted this year. There have been four small ‘change of use’ applications permitted that have involved the introduction of additional D1 uses into the town centres. These uses are considered acceptable outside of the Primary Retail Frontage where they are considered to compliment the retail centre and enhance the vitality and viability of the centre.

The refurbishment/ redevelopment of the Horton Chapel, last used prior to 1997, is a positive addition to the cultural/ community offer of the Borough. This will bring back over 800m2 of D2 floorspace into active use.</td>
</tr>
</table>

DM37	**Policy DM 37 Parking Standards** % of residential and commercial developments (complete) that meet car parking and cycle standards All new developments to meet car parking and cycle parking standards	There have been 10 refusals quoting this policy. These are generally based around inadequate/ insufficient off street parking and off-street parking pressures.	The monitoring procedures to determine whether every complete development has met parking standards is not in place. It is reasonable to assume that as we are refusing applications on the grounds of inadequate parking, the applications that are being approved are most likely to meet at least minimum standards. The Local Plan Review may consider a review of the local parking standards.

Economic Development

Policy	Existing Indicators and Targets	Performance	Analysis
CS11 **DM24** **DM25**	**Employment Provision/ Uses** Core Strategy Indicator: Amount of employment floorspace gained and lost per use class	Just two applications were determined during this AMR reporting year which involved the loss of employment floorpspace. Of these, one was permitted development Change of Use (PDCOU) which falls outside of the scope of local policy and resulted in the loss of 70m2 of B1 floorspace at Waterloo Road. The other was a Change of Use from B1 to D1 in Epsom High Street on the third floor. The offices were vacant and consequently the proposal is considered to be policy compliant.	Employment floorspace is still being lost as a result of PDCOU applications, although the Council has taken action to protect key employment sites through issuing Article 4 directions. A Spatial Economic Development Strategy is being prepared as part of the evidence base for the new local plan. This will consider the Borough's approach to encouraging and retaining employment uses and accommodating Epsom & Ewell's future growth and development needs.
DM26	**Policy DM26 Equestrian-Related Development in the Green Belt** Applications for equestrian related development in the Green Belt	18/00110/FUL Clear Heights Stables, Derby Stables Road Demolition of existing wooden stables and redevelopment of the site to provide a range of 24 wooden loose boxes, erection of a new building to serve as a feed room and tack room. Retrospective application for the erection of a horse walker. PERMITTED 21.8.18 18/00288/FUL DOWNS HOUSE, Walton Road Racehorse training yard redevelopment. PERMITTED 22.1.19	Policy DM26 formally states our commitment to support the racehorse training industry in the Borough. The granting of planning permissions at these two sites will help to support the racehorse training industry in the borough by improving the quality of facilities. The new Local Plan will continue to seek to protect and enhance the Racehorse Industry and its important role in the heritage of the Borough.

Retail

	Existing Indicators and Targets	Performance	Analysis
CS14 **E4**	**Retail Floor Space** **Town Centre retail area / primary & secondary frontage** Amount of retail floorspace gained/lost within town centre, and percentage within defined primary or secondary shopping areas Target: % of A1 units in identified Primary Retail Frontages to not fall below 66%	Town Centre: 17/00001/FUL Development Site at Upper High Street: Proposed Mixed Use Development comprising food retail store (Use Class A1) together with 30 Residential Apartments, Access, Parking, Servicing and Landscaping (+2844m2) 18/01063/FUL 19 Upper High Street Proposed change of use from A1 to D1 (-104m2) 18/00487/FUL 82 East Street: Change of use from Shop (A1 use) to Dwelling (C3 use) at first floor level (-50m2) 18/00584/FUL 131 High Street, Epsom: The change of use from a Sui Generis Drop In Centre to Class A1 (retail) (+188m2)	This year there has been a loss of 305M2 of A1 retail floorpsace in the town centre (based on permissions granted). There has been planning permission granted for an additional 3032M2 of A1 retail in the Town Centre. This gives a total of 2,727M2 of A1 retail floorspace being granted this year (net). This Is mostly due to the granting of planning permission for a Lidl supermarket on the Upper High Street site. This site has permission for a mixed use scheme and is an identified opportunity site in Plan E. We considered and refused an application at 17 High Street for change of use from A1 to A3/A5 on the grounds of it being an inappropriate use in the Primary Retail Frontage, resulting in a proliferation of non- A1 uses in an important frontage in the Primary Retail Area, contrary to Policy E4 of Plan E and Policy CS14 of the Core Strategy 2007. This decision was appealed and allowed. The Inspectors decision appeared to be based on the importance of bringing a

		18/00653/PDCOU 82B East Street Notification for Prior Approval for a Proposed Change of Use of the 2nd floor of a Building from Shops (Class A1) to a single residential unit (Class C3) (-50m2) 18/00086/FUL 17 High Street, Epsom: Change of use of ground floor and first floor from retail (Use Class A1) use to a mixed restaurant and hot food take-away use (mixed A3/A5 use), incorporating a replacement shopfront, plant, new rear external staircase at first floor level. APPEAL GRANTED. (-101m2)	vacant unit back into use despite the use not being in line with planning policy. Their decision was made in spite of there being below regional and national average vacancy rates across the Town Centre at the time. The Retail Needs Assessment and Health Check that has been commissioned for the Local Plan will consider this decision and the implications on the plan going forward.
DM28	Amount of A1 floorspace gained/ lost in shopping centres and primary retail centres as a result of planning permission granted Target: The overall percentage of A1 retail uses to remain above 50% of the total shopping units within a designated shopping centre	Other Centres 18/00568/COU 71 Stoneleigh Broadway: Change of use from A1 to D1 for the purpose of an adult and child Spanish tuition and cultural centre. (-223m2) 18/00365/FUL 17 Pound Lane Change of use from a shop (A1 use) to a cafe (A3 use), including new extraction duct (-57m2) 18/01550/FUL 15 Castle Parade: Change of use to A1/A4, the intention is to open a micropub with takeout facility, hence dual use. (-32.8m2) 18/00237/PDCOU 59 Poole Road, West Ewell: Prior Approval Application for the proposed change of use from A1 Shop to C3 Residential. PRIOR APPROVAL REQUIRED AND REFUSED (-60m2)	Of particular note is the PDCOU refusal at the local shopping parade at Poole Road which was possible due to local centre designation. It is important that we keep these vital local centres protected to ensure sustainable neighbourhoods for the future. . *'The proposal does not constitute permitted development under the criteria of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), Schedule 2, Part 3, Class M. 1 (d)(i)(ii) as the change of use would involve the loss of an A1 retail unit, which is located centrally within the defined local centre which would have a negative impact on the cohesiveness and vitality of the centre.'* The high proportion of residential units delivered within the town centre is positive, reflecting greater densities and use of sustainable town centre sites.
DM29	**Major New Retail Developments** Planning applications for new retail floorspace- granted and refused	17/00001/FUL Development Site at Upper High Street: Proposed Mixed Use Development comprising food retail store (Use Class A1) together with 30 Residential Apartments, Access, Parking, Servicing and Landscaping (+2844m2)	The outstanding planning permission for over 2,500M2 of A1 retail floorspace will be taken into account in the Retail Study to ensure that we plan for the right amount and types of new retail floorspace in the borough, in the most suitable locations.

Plan E

Policy number	Policy Existing Indicators and Targets	Performance	Analysis
E1 Town Centre boundary	Town Centre Health Check (This will provide a comprehensive overview as to how the town centre is performing, drawing on many sources of information)	A Town Centre Health Check is being prepared by an external retail expert for the new Local Plan and should be complete by the end of 2019.	
E2 Housing capacity	Net additional housing units delivered within the town centre and number of affordable	There were 25 housing completions in Town Ward this year. Only 2 of these were affordable (at Chase Road).	Many of the Town Centre opportunity sites are yet to come forward for redevelopment, however part of the Depot Road and Upper High Street site has recently received permission for a mix of retail and housing. The Utilities site is likely to form an important strategic site in the new Local Plan.
E3 Retail capacity	Rank in the retail hierarchy (Experian data, national rankings) Amount of completed retail floorspace	The granting of over 2,500 m2 of convenience floorpsace at the Upper High Street site fulfils all of the need for convenience floorpsace up to 2026 (as identified in Plan E). A recent (2018) publication by Experian has ranked Epsom 4th in a list of the UK's multi-channel shopping hotspots (following Guildford, Tunbridge Wells and Horsham). http://www.experian.co.uk/marketing-services/news-retailscape-uk-retail-centres-best-placed-to-thrive.html This means that shoppers within Epsom's catchment are embracing retailers' multi-channel shopping offers. The Town Centre Retail Health check (2015) identified that the vacancy rate in Epsom has remained consistently low and that there "is currently no significant clustering of vacant units within Epsom Town Centre". This will be explored further in the 2019 Health Check.	The Depot Road and Upper High Street site has been allocated to deliver 2,000 sqm of retail floor space. The recently commissioned Retail Needs Assessment and Town Centre Health Check will give the borough a full picture on the success of the town and its current rankings.
E5	**Employment floorspace provision** Amount of employment floorspace (B1, B2, B8 uses) lost and gained	There have been no applications for additions of employment floorspace. A loss of 230m2 of B1 floorpsace has been approved in the town centre and 70m2 where permission was not required (Permitted Development). 1088m2 has been approved to be lost at Miles Road which is in Town Ward. 18/00855/PDCOU Clocktower Cars, 5 Waterloo Road. Change of Use B1 (70m2) to C3 (1F). Prior Approval Not Required 11.1.19 17/01758/PDCOU Aviary Court, 138 Miles Road. Change of Use B1a (1088m2 to C3 (8 flats) Prior Approval Permitted 1.5.18 18/00289/FUL 55-59 High Street, Epsom. Change of use from B1 (-230m2) to D1 (dental surgery). PERMITTED 26.9.18	The general trend is for employment floorspace to be redeveloped for higher density residential use although this appears to have slowed down this year. The PDCOU applications (permitted development) are beyond the influence of most local policies.
E13	Changes to the road network	Following detailed testing of returning two way traffic to South Street a package of highways and environmental improvements have been identified known as the Plan E Improvements Scheme. Working in partnership with Surrey County Council funding of £2.7m has been awarded from the Coast to Capital Local Enterprise Partnership (LEP) to implement the scheme. Funding has also been provided from EEBC via the Community Infrastructure Levy. The 'South Street two-way' improvement scheme (phases E F and G) have now been implemented as has phase B 'Spread Eagle Junction improvements'. Phase C and D on the market place have commenced and will be completed by the end of 2020.	The successful implementation of the Plan E improvements scheme has demonstrated the benefits of partnership working and having a comprehensive plan to direct and manage future change in the Town Centre. Plan E has been the catalyst for helping to identify and

		The improvements aim to reduce congestion and promote economic growth by making it easier for shoppers to negotiate the town centre and provide an attractive business environment, encouraging investment and supporting the creation of jobs. Further funding will be required to extend the programme of works further along the High Street (north) to the quadrant junction.	successfully attract funding to deliver such improvements.
Plan E site allocations	E14 Depot Road / Upper High Street E15 Utilities Site, East Street E16 Epsom station site E17 Other Opportunity Sites a. Market Place, High Street b. Former Woolworth's Store, High Street c. Pickard House, Upper High Street d. Former Magistrates and County Court site, The Parade/ Ashley Road e. Global House, Ashley Avenue f. TK Maxx Store, High Street g. Emergency Service Uses, Church Street h. Comrades Club, The Parade i. Land to rear of The Albion Public House, South Street j. Town Hall Square and car park, rear of Town Hall	E14 Planning Permission has been granted for 30 residential units and 2844m2 of A1 convenience retail floorpsace. E15 The Lintons Centre has been redeveloped. The rest of the site is likely to be an important strategic site for the new Local Plan. E16 Redeveloped a) Market Place Improvements to the Market Place are currently underway as part of the Plan E improvement scheme. b) Former Woolworths Store, High Street No applications have been brought forward for this site. The unit is now occupied by Poundland. c) Pickard House, Upper High Street Site has been fully developed. d) Former Magistrates and County Court site, The Parade / Ashley Road Site has been fully developed e) Global House No applications have been brought forward for this site. f) TK Maxx Store, High Street No applications have been brought forward for this site. g) Emergency Service Uses, Church Street A planning application is currently pending decision at the Police Station site which includes the demolition of the police station and erection of 29 residential units. No other applications have been brought forward for the other parts of the site but the Council is likely to include these sites in the new Local Plan for comprehensive development. h) Comrades Club, The Parade Site has been redeveloped as a mixed-use development comprised of a 57 bed hotel. i) Land to the rear of The Albion Public House, South Street No applications have been brought forward for this site. j) Town Hall Square and car park, rear of Town Hall No applications have been brought forward for this site.	

The Built Environment

Policy Number	Policy	Performance	Analysis
CS5 **DM8** **DM9** **DM10**	The Built Environment **Heritage Assets** **Listed Buildings** **Locally listed Buildings** **Proposals having an effect upon Heritage assets**	There has been 30 valid Listed Building Applications received this reporting year. Of these, 26 were permitted and 4 were refused. Reasons for refusal include: The proposed replacement antennas due to their size and location would result in substantial harm to a designated heritage asset contrary to Paragraph 194 of the NPPF and contrary to the objectives of Policy DM8 of the Development Management Policies Document 2015 and Policy CS5 of the Core Strategy The proposed development would materially harm and detract from the character of the existing listed building and significantly harm this designated heritage asset. The proposal is thus contrary to section 16 of the NPPF (2018) paragraphs 193 & 194, Policy CS5 of the Core Strategy (2007) and Policies DM8, DM9 and DM10 of the Development Management Policies (2015). Replacement of the windows with new elements of sympathetic design, appropriate materials and conventional opening mechanisms is acceptable in principle. However, the proposal requires considerable amendment in order to avoid harm to the significance of the designated heritage asset and with reference to Policy DM8; it cannot be supported in the present form.	We intend to prepare and produce supplementary planning guidance on Design Quality. This will provide supplementary advice to the design policies in the Development Management DPD. Policies DM8/9/10 appear to be performing well, being used to assess applications for Listed Building works and in Conservation Areas. Where a refusal is made, Policy DM8 is being quoted alongside the NPPF and is helping to create strong policy grounds for refusal. The Council expects a high quality of design in planning applications. Policies DM9 and 10 are frequently used policies. Decision taking using design policies is generally subjective. Decisions often come down to a finely balanced opinion We need to determine whether our Conservation Area Appraisals remain up-to-date, or whether they should be subject to review.

Green Infrastructure and the Environment

Our Green Infrastructure is an essential part of what makes Epsom & Ewell a special and unique place. It is just as important as our transport, education and health networks. It not only serves to make the Borough look beautiful but it also helps make it a place that is healthy, safe and one that is connected to the natural world

The majority of our existing Green Infrastructure asset network is already identified and protected through a variety of planning policy designations. These include our Green Belt; Sites of Special Scientific Interest; Sites of Nature Conservation Interest, Local Nature Reserves; Ancient Woodland; and our parks and open spaces. All of these sites are identified on our Local Plan Proposals Map. The biodiversity polices (CS3, DM4, DM5) are difficult to formally monitor. The only information available tends to be anecdotal evidence to show that biodiversity is being considered in planning applications. This can include the requirement for bat boxes or additional tree planting and in some cases a protected species or badger survey to be carried out.

Tree/hedgerow protection measures are common place conditions on new developments. More specific conditions are placed on planning applications where there are particular areas of biodiversity that may be at risk.

The Council adopted guidance on Biodiversity in Planning in February 2012 which sets out advice and requirements for planners and developers. The new Local Plan will have a strong thread of biodiversity enhancement running through it and will consider additional ways to deliver biodiversity improvements in the future.

Policy Reference	Policy Indicator Target	2018/19 Performance	**Analysis**
DM1 **CS2** **DM2**	**Extent of the Green Belt** Number and type of planning permissions granted in the Green Belt / and within the boundaries of the Major Developed Sites Core Strategy: All development allowed in Green Belt meets criteria in national policy	In 2018/19 there has been 109 permissions granted in the Green Belt. These applications are broken down as follows: *20 for work on TPO trees.* *8 for Listed Building works.* *44 householder applications including small extensions and conversions of loft spaces and garages.* *23 full planning permissions including the conversion of Horton Chapel, the Downs House redevelopment, Cemetery extension, Clear Heights Stables Refurbishment and 6th form centre at Epsom College (Major Developed Site).* *6 minor amendments and condition discharges* *8 Certificates of Lawful Development*	We will continue to oppose inappropriate development within the Green Belt and will consider whether the precise Green Belt boundary needs to be amended in the Local Plan review. The Development Management Policies document seeks to manage the size of new extensions in the Green Belt by ensuring that no increase in size over 30% of the original footprint would be permitted. The replacement of existing buildings in the Green Belt will be managed by retaining existing uses and ensuring that replacement buildings are not materially larger than those they replace.
DM3	**Replacement and extensions of buildings in the Green Belt** Number and type of planning permissions granted for replacement of buildings or extensions in the Green Belt	There has been 37 permissions granted for extensions in the Green Belt. This does not include Certificates of Lawful Development.	Policy DM3 appears to be being used on a regular basis to determine whether an extension is materially larger than is acceptable. Proposals that are over 30% are not being approved.
DM5	**Policy DM5 Trees and Landscape** Refusals quoting the policy	This policy is frequently used to refuse planning applications that are not appropriate due to the impact the development will have on the trees or landscape. This policy will be carried forward to the new Local Plan and is very important for the protection of trees and landscape in the borough. Examples include; 17/01494/FUL 78 Riverview Road Erection of 1 x 4 bed house and 2 x 2 bed bungalows with associated parking accessed from Milbourne Place The close proximity of the proposed bungalow at Plot 2 to the Hornbean trees T4 and T5 would have an adverse impact on the living conditions of the occupants of the proposed dwelling due to excessive tree shade and nuisance and is therefore likely to result in future pressure to heavily prune trees to the detriment of the visual amenity of the locality. The development would also result in root damage to trees during the construction of the proposed dwelling because of the encroachment within the root protection area. The application is therefore contrary to the requirements of Policies CS1 and CS5 of the Epsom and Ewell Core Strategy (2007) and Policies DM5, DM10 and DM12 of the Development Management Policies (2015).	

		17/01618/FLH 12 Gabrand Walk Conversion of existing garage to habitable space with raised roof level, erection of single storey rear extension. The proposed development would be likely to have an adverse impact on the protected European Black Pine and the Horse Chestnut, leading to a harmful impact on the future health and vigour of these protected trees. It would also give rise to future requests to fell the trees or carry out harmful pruning work to their canopies, adversely affecting the landscape character of the conservation area, contrary to Policy CS1 of the Core Strategy 2007 and Policies DM5, DM8 and DM9 of the Development Management Policies Document 2015. 17/01865/FLH 2 Chartwell Place Single storey side extension with roof light to front and rear roofslope The proposed development given it location and close proximity to the TPO adjacent to the application site along Downs Road, the proposed extension given it size, scale and dimension and inadequate spacing proposed for replacement planting and trees would result in detrimental impact upon the local character and unacceptable condition for future replacement trees to grow. The proposal is therefore contrary to Local Plan Policies CS1 and CS5 of the Borough Adopted Core Strategy 2007 and DM5 of the Borough's Development Management Document (2015).
CS4	Open Spaces and Green Infrastructure Amount and range of open space provided in the Borough relative to requirements set out in the most recent open space audit	Emphasis will continue to be placed on protecting and enhancing the two Strategic Open Spaces of Nonsuch Park and the Hogsmill River. Imbedding Green Infrastructure throughout the borough will be a key theme for the new Local Plan. We have commissioned a Sports Facilities and Playing Pitch Strategy that will consider the range and quality of open space and facilities in the borough. This will enable us to determine whether there is a need for additional facilities and to assess the quality of current provision.
DM19	**Policy DM19 Development & Flood Risk** The Core Strategy contains an indicator 'Number of planning permissions granted contrary to EA advice of flood risk' The Core Strategy target is for '100% of decisions to be made in accordance with EA advice. 100% of development to reduce volume and rate of run-off	One application was refused on flood risk grounds: 17/001465/FUL 110 Ruxley Lane: Erection of 4-bedroom detached dwelling. Refused: *The ground floor of the proposed dwelling is at risk of flooding from the Hogsmill River. The submitted Flood Risk Assessment produced by UK Flood Risk Consultants, fails to demonstrate that the development is safe from flooding and would not increase flood risk elsewhere, which is contrary to the requirements of Policies CS1 and CS6 of the Core Strategy (2007) and Policy DM19 of the Development Management Policies Document 2015.*

Appendix A - List of housing completions 2018-2019

Application No.	Address	Units Proposed	Units completed	Units Lost	Net Change	Tenure	Type	Area Ha	Density
Auriol									
14/00952/FUL	5A Stoneleigh Park Road, Stoneleigh	1	1	0	1	Private	New Build	0.02	50
Total					1				
College									
14/01855/FUL	Priam Lodge Stables, 83 Burgh Heath Road, Epsom	4	4	1	3	Private	New Build	1.018	4
Total					3				
Court									
15/01395/FUL	Garages 23 to 42 Teddington Close	6	6	0	6	Private	New Build	0.084	71
15/01497/FUL	101 to 111 Hollymoor Lane	30	30	6	24	20 Affordable rent & 10 Shared Ownership	New Build	0.125	240
15/01396/FUL	Garages 1 to 37 Bahram Road	5	5	0	5	Private	New Build	0.117	43
16/00885/FUL	15A Hyperion Place Epsom	1	1	0	1	Private	New Build	0.039	26
13/01718/FUL	Meadowcroft, 56 Longmead Road	3	3	1	2	Private	New Build	0.055	55
Total					38				
Cuddington									
16/01693/RES 16/00193/ OUT	Land Adjacent Riverside Cottage Old Malden Lane Worcester Park	1	1	0	1	Private	New Build	0.09	11
10/00465/FUL	13 The Avenue, Worcester Park	5	5	0	5	Private	New Build	0.142	35
Total					6				
Ewell									
17/01026/FUL	27 High Street Ewell	6	6	0	6	Private	Conversion	0.028	214
Total					6				
Ewell Court									
16/01753/FUL	317 Kingston Road	2	2	1	1	Private	New Build	0.05	40
17/01370/FUL	407A Kingston Road	1	1	0	1	Private	Conversion	0.02	50
17/01888/FUL	407 Kingston Road Ewell	1	1	0	1	Private	Conversion	0.02	50
Total					3				
Nonsuch									
15/00098/FUL	NESCOT Agricultural Land, Reigate Road, Ewell	91	1	0	14	Private	New Build	4.357	21
15/00098/FUL	NESCOT Agricultural Land, Reigate Road, Ewell	91	1	0	2	Shared Ownership			

15/00098/FUL	NESCOT Agricultural Land, Reigate Road, Ewell	91	1	0	12	Affordable rent	New Build	4.357	21
17/00429/FUL	Sycamore Gardens- NESCOT Agricultural Land, Reigate Road, Ewell	88	1	0	6	Private	New Build	4.357	21
16/00166/FUL	37 & 37a Cheam Road, Ewell	17	17	2	15	Private	New Build	0.095	179
17/00686/FUL	86 Reigate Road Ewell	3	3	0	3	Private	New Build	0.139	22
Total					52				

Stamford									
14/01750/RES	57 Woodlands Road, Epsom	6	6	1	5	Private	New Build	0.049	122
16/01340/FUL	Epsom Common Working Mens Club 121 - 122 Stamford Green Epsom	2	2	0	2	Private	Conversion	0.113	18
17/00830/FLH	47 The Greenway Epsom	1	1	1	0	Private	Conversion	0.06	17
Total					7				

Stoneleigh									
14/00795/FUL	Rear of 72 Stoneleigh Broadway (Flats 1-7 Stone House)	6	6	0	6	Private	New Build	0.027	222
Total					6				

Town									
15/01532/FUL + 17/00547/REM	Ashley House, Ashley Road	12	12	0	12	Private	Conversion		
16/00501/PDCOU	Rosebery Lodge, 61a South Street, Epsom	9	9	0	9	Private	Conversion	0.023	388
15/00686/FUL	15A Upper High Street, Epsom	2	2	1	1	Private	Conversion	0.0115	174
16/01448/FUL	2 Chase Road Epsom	2	2	0	2	Affordable rent	New Build	0.029	69
18/00131/FUL	141 Hook Road Epsom	2	2	1	1	Private	Conversion	0.034	59
Total					25				

West Ewell									
15/00176/FUL	14 Station Avenue, West Ewell	1	1	0	1	Private	New Build	0.021	48
Total					1				

Woodcote									
15/00992/FUL	Site at 4, Woodcote Side, Epsom (1-4 Lanthornes Ct)	14	14	0	14	Private	New Build	0.04	350
16/01581/FUL	The Gold Peak, Wilmerhatch Lane	1	1	1	0	Private	New Build	0.213	5
14/01442/FUL	54 Rosebery Road, Epsom	4	4	1	3	Private	New Build	0.09	11
16/00608/FUL	15 Pine Hill, Epsom	1	1	1	0	Private	New Build	0.26	4
Total					17				

Appendix B Housing Trajectory

Source of supply	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024-2029 Years 6-10	2029-2034 Years 11-15	2034 - 2037	Total
Delivered	160	165	65								390
Under Construction (145 homes)			9	24	48	32					113
Planning Permissions (233 homes)				31	87	37					155
NESCOT 2 (Sycamore Gardens)			50	38							88
Presto Haulage, The Old Mill, Old Malden Lane					60	20					80
Chalk Lane Hotel					21						21
Student accommodation- Sunnybank House			39								39
Other communal accommodation- Former Salesians			33								33
Other communal accommodation- Lower Mill					29						29
Upper High Street						30					30
Land at Mill Road						31					31
Kings Arms Public House, East Street, Epsom						21					21
Epsom and Ewell High School							60	100			160
Former Police Station, Church Street						10	19				29
Small SHLAA sites (5-10)								93	18		111
Medium SHLAA sites (11-15)								55	15		70
Large SHLAA sites (16+)											
29-37 East Street, Gas and Water Works Site								100	65		165
Spread Eagle Shopping Centre, High Street								35			35
Epsom Baptist Church, Church Street								41			41
TA Centre, Welbeck Close									62		62
Longmead Road/ Gibraltar Crescent								50			50
Church Street Conservative Club, Epsom Club and United Reform Church								40			40
Dairy Crest Ltd								20			20
32 Waterloo Road/ BRM Coachworks									30		30
Hope Lodge Car Park,									30		30
Organ & Dragon, London Road								40			40
Fire Station, Church Street									25		25
EEBC Town Hall, The Parade										30	30
Swail House, Ashley Road									150		150
Priest Hill Sports Centre Cheam Rd									20		20
Grafton Stables									40		40
South of Salisbury Road									20		20
Home Base, 23 Reigate Road										50	50
EEsso Express, 26 Reigate Road										17	17
Watersedge Estate Regeneration									110		110
TK Maxx Store									65		65
Health Clinic and Ambulance Station, Church Street									25		25
Remaining West Park Site									150		150
Windfall								135	100	80	315
Total	160	165	196	93	245	181	79	709	925	177	2930
Cumulative Total	160	325	521	614	859	1040	1119	1828	2753	2930	2930
Cumulative target	413	992	1571	2150	2729	3308	3887	6782	9677	11414	11414
Cumulative deficit	253	667	1050	1536	1870	2268	2768	4954	6924	**8484**	**8484**

Appendix C: Sites under construction or with outstanding planning permission

Sites Under Construction

Application No	Address	Ward	Commencement Date	Units Proposed	Units Lost	Net Change
16-17						
14/00646	69 Meadow Walk, Ewell	Ewell Court	03/05/2016	Granny annex	0	1
15/01133 (also 15/01574/REM)	4-6 Chuters Grove, Epsom	Ewell	09/05/2016	2Hx2B	0	2
15/01548/FUL	6 to 8 Chuters Grove	Ewell	09/05/2016	2Hx2B	0	2
08/00429	50 Gadesden Road, West Ewell	West Ewell	12/07/2010	2Fx2B,	1	1
10/00366	18 Stoneleigh Broadway, Stoneleigh	Stoneleigh	22/03/2013	1F x 1B, 1F x 3B	0	2
16/00712/FUL	1 Gadesden Road West Ewell	West Ewell		1H	0	1
					19/20	**9**
17-18						
14/00077	287 Kingston Road	Ewell Court	02/06/2017	1Hx2B	0	1
16/00585/FUL	45 Manor Green Road, Epsom	Stamford	30/05/2017	1H x 4B	1	0
17/00461/FUL	Mill House, Old Malden Lane, Worcester Park	Cuddington	20/11/2017	2Hx5B	1	1
17/00515/FUL	The Star 2 Cheam Road, Ewell	Ewell	21/11/2017	2Fx2B 1Fx1B	0	3
17/00256/FUL	5 Alexandra Road Epsom	College	02/11/2017	8Fx2B, 2F x 3B was D1 now C3	0	10
16/00096/FUL	Epsom Social Club, Horton Lane, Epsom	Stamford	20/12/2017	1	0	1
17/01853/FUL	101 College Road Epsom	College		9F x 2B	1	8
					20/21	**24**
18-19						
17/01085/OUT / 19/00519	8 Andrews Close Epsom	Town		8Fx1B	1	7
15/01530/FUL & 18/00139/NMA	1 Chase Road, Epsom	Town	04/06/2018	3F x 1B, 8F x 2B, 3F x 3B	1	13
17/00308/FUL	The White Horse Public House	Woodcote	Deemed 23/04/2018	1F x 1B + 1 Studio	2 bedsits	0
17/00121/FUL	5 Cox Lane West Ewell Surrey	Ruxley	19/06/2018	9F (3Fx3B, 4F x 2B, 1Fx1B and 1 studio)	1	8
17/00020/FUL	6A Upper High Street Epsom	Town		2F x 1B	1	1
18/00084/FUL 18/01065/REM	490 Chessington Road West Ewell	Ruxley	31/10/2018	2Hx3B 2Hx2B	1	3
15/00214/OUT 17/01574/RES	RO 12&14 Grosvenor Road Epsom	Woodcote	02/01/2019	1Hx 2B (Bungalow)	0	1
15/00336/FUL + 17/01320/REM	Land Rear 44-48 Stoneleigh Broadway, Stoneleigh	Stoneleigh	01/11/2018	2Fx3B, 2Fx2B, 2Fx1B	0	6
18/00537/FUL	27 -29 High Street Ewell	Ewell	22/10/2018	2Fx1B + 1F x2B	0	3
17/01395/RES + 15/00043 /OUT	Haddad House 91 East Street Epsom	Town	25/01/2019	5Fx2B	1	4
18/00801/FUL	86 Reigate Road Ewell	Nonsuch	04/03/2019	2H x 3B	0	2
18/00117/FUL	The Durdans Stables Chalk Lane Epsom	Woodcote	07/03/2019	1H x 4B	0	1
15/01388/FUL	Grange Mansions, Kingston Road	Ewell	08/02/2019	1Fx1B,2Fx2B,1Fx3B	0	4
18/01148/FUL	Land Adjacent To St Stephens Church Rosebery Road Epsom	Woodcote	14/03/2019	2Hx3B	0	2
					21/22	**48**

19 -20						
17/00334/FUL	55 Christ Church Mount	Stamford	17/06/2019	1Hx 4B	1	0
18/00185/FUL + 19/00092/COND	6 Plantagenet Close Worcester Park	Ewell Court	20/05/2019	1Hx3B	1	0
17/01419/FUL	7 Cox Lane West Ewell	Ruxley	24/06/2019	3Fx1B 4Fx2B 2Fx3B	1	8
18/00697/FUL	110 Ruxley Lane West Ewell	Ewell Court	25/05/2019	1Hx4B	0	1
19/00494/FUL	88 Northey Avenue Cheam	Nonsuch	01/08/2019	1Hx4B	0	1
19/00519/RES BF	8 Andrews Close Epsom	Town	22/07/2019	6Hx1B + 3H ?B	1	8
18/00721/FUL	Land To The Rear Of 41 To 67 Hook Road Epsom	Town	03/07/2019	4Hx5B	0	4
18/01494/FUL	187A Kingston Road Ewell	Ewell Court	08/07/2019	1Fx1B	0	1
19/00136/PDCOU	46 High Street Ewell	Ewell	21/05/2019	2Fx1B	0	2
17/00932/FUL	4-5 Market Parade High Street Ewell	Ewell	01/07/2019	4F x 2B	0	4
18/00805/FUL	135 Riverview Road Ewell	Ewell Court	01/06/2019	2Hx3B	1	1
16/01564/FUL	80 Rosebery Road Epsom	Woodcote	01/06/2019	2Hx 3B	1	1
18/01509/FLH	60 Rosedale Road Stoneleigh	Stoneleigh	20/11/2018	1B annexe (self contained) ???	0	1
					22/23	32

Application No	Address	Ward	Decision Date	Units Proposed	Units Lost	Net Change
16/01407/FUL	69-71 High Street Epsom	Town	13/02/2017	2Fx1B 1Fx2B	0	3
17/00132/CLP	171 Chessington Road	West Ewell	22/06/2017	1F	0	1
17/00353/FLH	6 Lindsay Close Epsom	Stamford	04/08/2017	1B granny annexe	0	1
17/00188/FUL	Bar XLR 79 East Street Epsom	Town	28/09/2017	6F x 2B, + 1 A1/B1 unit	0	3
17/00530/FUL	Wychwood Epsom Road Ewell	Ewell	29/09/2017	4F x 2B	1	3
17/00784/PDCOU	100 East Street Epsom	Ewell	12/10/2017	6Fx1B	0	6
16/01325/FUL	13 Ashley Road Epsom	Town	20/12/2017	3Fx3B 2Fx2B	2	3
17/00387/FUL	YoYo DropIn Centre 24 South Street Epsom	Town	22/01/2018	1Fx 1B and 1F x 2B	0	2
17/01101/PDCOU	1st and 2nd floor offices 1 - 3 Cheam Road Ewell	Ewell	22/02/2018	2F x 3B	0	2
17/01242/FUL	31 Prospect Place	Town	28/02/2018	1 x2B	0	1
17/01321/FUL	Ebbisham Court 34 Dorking Road Epsom	Woodcote	09/03/2018	1F x 2B	0	1
17/01601/PDCOU	Ground Floor 82 East Street Epsom	Town	03/04/2018	3Fx1B	0	3
17/01398/FUL	329 Hook Road Epsom	Court	16/03/2018	1Hx3B 1Hx2B	1	1
17/01490/OUT	29 Cox Lane West Ewell	Ruxley	28/03/2018	1 bungalow	0	1
					2020-21	31
17/00833/FUL + 18/01024/MMA	16 Cleveland Gardens Worcester Park	Cuddington	27/04/2018	1Hx2B	0	1
17/01722/FUL	2 Hunters Close Epsom	Stamford	30/04/2018	1Hx3B	0	1
17/01758/PDCOU	Aviary Court 138 Miles Road Epsom	Town	01/05/2018	4Fx2B 4Fx1B	0	8
17/01392/FUL	Land Adjoining 50 Woodlands Road Epsom	Stamford	16/05/2018	1H x 2B bungalow	0	1
17/01583/FUL	Darbys Newsagents 50 Stoneleigh Broadway	Stoneleigh	16/05/2018	2Fx2B	0	2
17/01579/FUL	Stan James Adair House 4- 6 High Street	Town	05/06/2018	2Fx2B	0	2

17/01863/FUL	22 Hyperion Place Epsom	Court	26/06/2018	1Hx2B	0	1
18/00168/FUL	2A River Way Ewell	Ewell Court	27/06/2018	1Hx2B	0	1
18/00183/FUL	Land Rear Of 36 Horton Hill Epsom	Court	26/07/2018	1H x 2B	0	1
18/00297/FUL	78 Riverview Road	Ewell Court	06/08/2018	2Hx2B 1Hx4B	0	3
17/01306/REM	Rear of 72 Stoneleigh Broadway	Stoneleigh	15/08/2018	Additional 1studio flat	0	1
17/00469/FUL	41 Kendor Avenue	Stamford	22/08/2018	1Hx 1B	0	1
18/00487/FUL	82 East Street Epsom	Town	11/09/2018		0	1
17/01841/COU	1A Station Avenue West Ewell	West Ewell	11/09/2018			-1
18/00153/FUL	54 High Street Epsom	Town	26/09/2018	2Fx2B	0	2
18/00494/FUL	18 Mill Road	College	02/10/2018	1 Bedsit	0	1
17/01797/FUL	Freedman Alexander Solicitors First Floor Offices 57 - 61 High Street Ewell	Ewell	15/10/2018	3F x 2B	0	3
18/00653/PDCOU	82 East Street Epsom	Town	17/10/2018	1Fx2B	0	1
18/00432/OUT	74 Ebbisham Road Epsom	Woodcote	19/10/2018	1Hx2B	0	1
18/00396/FUL	19 Woodlands Avenue Worcester Park	Cuddington	06/11/2018	1H x 4B	0	1
18/00372/FUL	499 Chessington Road West Ewell	Ruxley	16/11/2018	1Hx5B	1	0
18/00702/RES	Land Adjacent 32 Downs Road Epsom	College	21/11/2018	1Hx		1
18/00486/FUL	1 Whitmores Close	Woodcote	26/11/2018	2Fx1B 3Fx2B 1Fx3B	1	5
17/00334/FUL	55 Christ Church Mount	Stamford	06/12/2018	1H 4B +	1	0
18/01090/FUL	Curry Master 403 kingston Road Ewell	Ewell Court	18/12/2018	1Fx1B	0	1
18/00647/FUL	6 The Grove Epsom	Town	20/12/2018	4Fx2B 2Fx1B	1	5
18/00855/PDCOU	Clocktower Cars 5 Waterloo Road Epsom	Town	11/01/2019	1Fx1B	0	1
18/00288/FUL	Downs House Walton Road Epsom	Woodcote	22/01/2019	4H x 4B +	0	4
18/01055/FUL and 19/00159/REM	12 Longdown Lane North Ewell	Nonsuch	23/01/2019	1Hx4B	0	1
18/01383/FUL	33 Amis Avenue West Ewell	Ruxley	18/02/2019	2Hx 3B	1	1
18/01536/FUL	3 Beverley Close Ewell	Nonsuch	21/03/2019	2Hx3B	1	1
18/01513/FUL	East Lodge 117 East Street	Town	22/03/2019	3Fx1B 4Fx2B	1	6
17/00188/FUL	Bar XLR 79 East Street Epsom	Town	28/09/2017	6F x 2B, + 1 A1/B1 unit	0	3
16/00653/OUT	25 Alexandra Road	College	06/07/2017	14F 2 of which are social rented	1	13
16/01919/FUL	70 Worple Road Epsom	Woodcote	01/06/2017	1H x 3B	1	1
18/01264/FUL BF	10 Old Schools Lane Ewell	Ewell	18/04/2019	4Hx3B 2Hx2B	0	6
19/00871/FUL	Land adj 22 The Headway	Ewell	05/09/2019	1Hx4B	0	1
18/01150/FUL	111 East Street Epsom	Town	28/03/2019	3Fx1B 3Fx2B	1	5
					2021-22	87
18/00998/FUL	139 Holmwood Road Cheam	Nonsuch	05/04/2019	1Hx4B NB	0	1
18/01574/FUL	10 Lansdowne Court The Avenue Worcester Park	Cuddington	10/04/2019	1Hx3B 1Hx2B	0	1
19/00093/FUL	Epsom Point 84 - 90 East Street Epsom	Town	17/04/2019	1fx2B	0	1
19/00117/FUL	Priory Court Old Schools Lane Ewell	Ewell	18/04/2019	7 Addn bedspaces	0	3
18/01298/FUL	Victory House 23 West Street Epsom	Town	23/04/2019	2Fx1B	0	2
19/00271/FUL	Former Store 21 44 High Street Epsom	Town	16/05/2019	5Fx1B	1	4
19/00015/FUL	The Lodge West Street Ewell	Ewell	17/05/2019	2Hx3B 1Hx2B	0	3

19/00223/FUL	Land At Rear Of Aviary Court 138 Miles Road Epsom	Town	22/05/2019	2Fx2B	0	2
19/00062/FUL	Land Adjoining 31 Rosebank Epsom	Town	22/05/2019	4Fx2B	0	4
19/00301/FUL	Maritime Court Blenheim Road Epsom	Court	22/05/2019	3Fx1B 1Fx2B	0	4
19/00291/FUL	29 Cox Lane West Ewell	Ruxley	07/06/2019	1Hx3B	0	1
19/00408/FUL	33A Waterloo Road Epsom	Town	10/06/2019	1Fx1B 1Studio	1	1
18/01311/FUL BF	224 Ruxley Lane West Ewell	Ruxley	14/06/2019	1Fx3B 1Fx1B 4Fx2B	1	5
19/00358/PDCOU	17 Depot Road Epsom	Town	19/06/2019	2F - studio	0	2
19/00079/FUL	6 Whitehorse Drive Epsom	Woodcote	04/07/2019	1Hx4B	1	0
19/00538/RES	320 Chessington Road West Ewell	West Ewell	04/07/2019	1Hx 3B	0	1
19/00577/FUL	Second Phase Of Development At Elm Grove Epsom	Woodcote	11/07/2019	2Hx2B	0	2
					2022-23	37

Appendix D: Five Year Housing Land Supply 2019

Introduction

The supply of housing in Epsom & Ewell is monitored throughout the year. Returns are made to the Ministry of Housing, Communities and Local Government on a quarterly and yearly basis and formally reported in our Annual Monitoring Report. The monitoring function is used to assess whether there is adequate provision to meet the housing requirements of the Borough.

Local Planning Authorities should, as required in Paragraph 73 of the National Planning Policy Framework (NPPF), identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing. The housing land supply statement responds to this and brings together information on development permitted and land identified as deliverable within the Borough of Epsom & Ewell.

This statement sets out the Borough's position over the five year period April 2019- March 2024 and demonstrates that there is **not currently sufficient provision to meet requirements for the 5-year period.**

The Planning Policy Context

The NPPF requires Local Planning Authorities (LPAs) to significantly boost the supply of homes by identifying a sufficient supply and mix of sites, taking into account their availability, suitability and economic viability.

The NPPF states that planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period; and
b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

The NPPF 2019 defines 'Deliverable' as follows:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

The NPPF defines 'Developable' as follows:

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Sites included in the 5 year supply for Epsom & Ewell

Sites that have the potential to deliver housing during the 5 years, that can be considered to be 'deliverable' in line with the NPPF are limited to:

- sites that have planning permission that have not been implemented or that have commenced
- sites allocated in Plan E- this is the only adopted plan that includes allocations at this time. (There are no Plan E sites that we believe will deliver housing in the first five years)

Windfall sites are not included in the five year supply, although these have been a steady source of housing supply in the Borough historically and are included in the housing trajectory in the later plan period. Since the adoption of the first SHLAA in 2009 there has been an average windfall delivery of 27 units per year on small sites.

The housing requirement 2019-2024

There are four required components to calculate the Borough's five year housing supply requirements. These are set out below and summarised in table 3.

a) The housing requirement for the Borough 2017-2037

In July 2018 the Revised National Planning Policy Framework was published. Alongside other changes, this introduced a new standard methodology for calculating objectively assessed housing need- resulting in a new housing needs figure of 579 units per annum for the Borough. For the purpose of this statement this is the Borough's '*housing requirement*' for 2019- 2037.

The publication of the revised national policy and guidance in 2018 saw the introduction of various measures by central government to increase housing delivery in the country through the Planning system. This included the introduction of a new test known as the Housing Delivery Test (HDT). The HDT measures the previous three years housing delivery in an authority area against the authority's housing requirement. The failure to meet 95% of the requirement results in the need to prepare an Action Plan and failure to meet

85% of the requirement results in the addition of a 20% buffer to the housing requirement, where the Council is required to identify a five year supply of deliverable sites.

The results of the HDT identifies that the Borough Council oversaw the delivery of 57% of housing required in the past three years. This is below the 85% threshold set in relation to paragraph 73 of the NPPF and the threshold of 95% of the paragraph 75 of the NPPF. Therefore the Council will be required to; identify a supply of deliverable sites including an additional 20% buffer (moved forward from later in the plan period); as well as prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years (respectively). The Action Plan can be viewed online. For the purposes of this statement the 20% buffer figure, which is calculated as 695, is the '*housing requirement+20%*'.

a) The housing requirement (2017-2037)

		Dwellings	Average Dwellings Per Annum	Dwellings 20% buffer	Average Dwellings Per Annum
a)	Housing requirement 2017-2037 (20 years)	**11,414**	**570**	**13,697**	**685**

b) Net addition to stock 2017-19

The net additions to dwelling stock for the period 1 April 2017 to 31 March 2019 has been 325 dwellings. This represents 33% of the Borough's housing requirement for those two years.

b)	Net additions to stock 2017-19	Dwellings	Average (mean) dwellings per annum
	2017/18	160	
	2018/19	165	
	TOTAL	**325**	163

c) Residual requirement for 2019-2033

The housing requirement for the remaining years of the plan period (2019-2037) is adjusted from the requirement of 579 and 579+20% dwellings per annum to reflect the level of housing that has already been delivered since 2017. This is the residual rate. The residual rate is; net completions for any elapsed years of the plan period; taken away from the total plan requirement; this figure is then divided by the number of years within the remaining period to give an annual residual housing requirement.

c)	a-b/ years remaining	11414-325/18	**11089 (616pa)**	(without 20% buffer)
c)	a-b/ years remaining	13697-325/18	**13372 (743pa)**	(with 20% buffer)

d) Requirement for five years 2019-2024 (without 20%)

This is calculated by multiplying the residual annual average by 5. The housing requirement for 2019- 2024 is **3080/ 3715** dwellings.

a)	Housing requirement 2017-2027	11,414	570
b)	Net additions to stock 2017-2019	325	163
c)	Residual requirement for 2019-2033 (a-b)	11089	616
d)	Requirement for 5 years 2019-2024	**3080**	(616x5)

d) Requirement for five years 2019-2024 (with 20% buffer)

a)	Housing requirement 2017-2027	13,697	685
b)	Net additions to stock 2017-2019	325	163
c)	Residual requirement for 2018-2032 (a-b)	13372	743

d)	Requirement for 5 years 2019-2024	**3715**	(743x5)

Sources of supply

For the site to be deemed deliverable it must also be **achievable.** Under normal market conditions, the area is economically buoyant and one of high demand for housing, consequently, once planning permission is granted for residential development there is a high degree of probability that the units will be constructed. The 5 year housing land supply includes a non- implementation discount rate of 5% for planning permissions and 15% for SHLAA sites. This takes account of the fact that not all sites granted permission (but most) will be implemented. The table below shows the current available sources of supply.

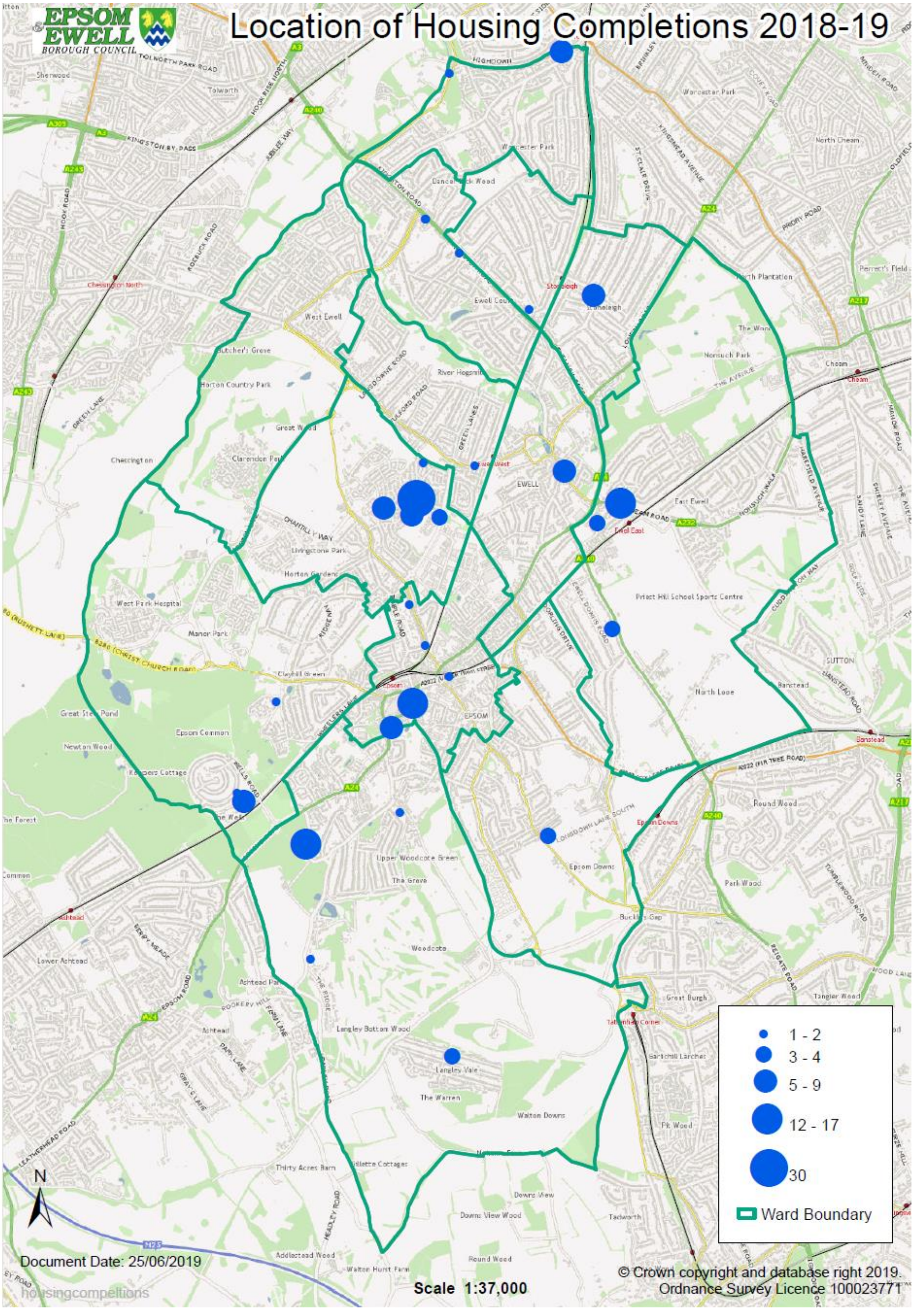
Source of supply	**Total 2019-2024**
Sites Under Construction (including communal accommodation)	338
Sites with planning Permission (5% reduction)	456
Total	794

1) Comparison of 5 year supply and requirement 2019-2024			**1) Comparison of 5 year supply and requirement 2019-2024 +20%**	
Deliverable Supply	794		Deliverable Supply	794
Requirement	3080		Requirement	3715
Deficit	**2286**		Deficit	**2921**
Percentage supply	**26%**		Percentage supply	**21%**
Representative number of years supply	**1.3 years**		Representative number of years supply	**1.1 years**

Conclusion

The 5 year housing supply calculation and housing trajectory indicate that overall, Epsom & Ewell does not have a 5 year supply of deliverable sites equal to the Local Housing Need Figure. It is important to note the outcome of the calculation is not a precise figure but provides a realistic but broad indication of the Borough's supply position.

Appendix E


Location of Housing Completions 2018-19
EPSOM EWELL BOROUGH COUNCIL
1 - 2
3 - 4
5 - 9
12 - 17
30
Ward Boundary
N
Document Date: 25/06/2019
housingcompeltions
Scale 1:37,000
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HOUSING DELIVERY TEST 2019

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	N/A
Annexes/Appendices (attached):	
Other available papers (not attached):	Draft Housing Delivery Action Plan 2019 Report to L&PPC 12 September 2019

Report summary

The Housing Delivery Test is an annual assessment by the Government of the performance of local planning authorities in delivering their identified need over the previous three years. The Council failed to deliver sufficient housing in the first Housing Delivery Test published in February 2019. Preliminary reports on the results of the second Test indicate the Council will not again deliver the required numbers again. This is serious and requires the matter being bought to the Committee's attention.

Recommendation (s)

The Committee notes the forecasted result for Epsom and Ewell in the government's forthcoming Housing Delivery Test for 2019 and the implications that this will have on the local planning authority's plan-making and decision-taking processes.

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

1.1 The delivery and implementation of the Epsom & Ewell Local Plan contributes towards all of the Council's Key Priorities. The new Epsom & Ewell Local Plan is critical as it will set out how sustainable growth, particularly in relation to new housing, will be delivered during the plan period.

2 Background

2.1 The Housing Delivery Test (HDT) was introduced with the revised national Planning policy (the National Planning Policy Framework) following central Government commitment to increase the number of homes being built with an overall ambition of 300,000 extra homes per annum by the mid-2020s. The HDT is an annual assessment of the performance of local planning authorities in delivering their identified need over the previous three years. This is an annual test that uses data that we submit as part of data returns to central Government.

2.2 The results of the first HDT were published during February 2019. They showed that Epsom and Ewell had not delivered a sufficient quantum of new homes between 2015-2018 (i.e. in the previous three years). The result was anticipated as we monitor housing delivery annually through our Local Plan Annual Monitoring Report (AMR).

2.3 The results of the first test showed that we only delivered 57% of the housing it was required to deliver during the three year period between 2015 until 2018. As a consequence of this under performance, we were required to prepare a Housing Delivery Action Plan (within the six months of the publication of the results) to identify the causes of under-delivery and to identify actions to increase it in the future.

2.4 We were given an additional 20% buffer, which was applied to our annualised housing requirement on its five year supply of deliverable sites (move forward from later in the plan period).

2.5 The effect of this was to raise the number from 579 new homes per annum to 695 new homes per annum. Consequently, we prepared our Housing Delivery Action Plan and we have factored into our Five Year Housing Land calculations the additional 20% buffer (published in our Annual Monitoring Report).

2.6 The purpose of the Action Plan is to set out how we will respond to under delivery and how it will raise delivery rates. The overall objective for the Action Plan is to identify what interventions could secure housing delivery and how it will maintain it in the future (specifically a five year housing land supply).

2.7 Once housing delivery has exceeded 85% of the previous three years requirement, the additional 20% buffer to the five year land supply will no longer apply and there will be less pressure on the authority to identify sufficient housing to 'front load' housing delivery in the short term (i.e. the next five years). The requirement will return to 579 new homes per annum in its five year housing land supply position statement.

2.8 Our Housing Delivery Action Plan was the subject of a report to this Committee on 12 September 2019. It identified a number of factors that contributed to the under delivery of housing. These included –

- limited resources, including land supply, construction material, manpower and skills;
- site constraints which can slow down decision making and restrict the level of units that can be accommodated on the site;
- the housing market and balancing of supply and demand: slow market absorption rates results in slow housing delivery rates; and
- lengthy processes, from site identification, site assembly, planning application and decision making process, technical investigations and on the ground delivery.

2.9 The Action Plan identified 24 interventions or actions that we take to improve performance. The Committee noted the contributing causes to under-delivery and considered the actions required to stimulate housing growth. The Action Plan was agreed at the committee.

3 Proposals

3.1 The next HDT results were due to be published November 2019. The results have not been published yet, however this is not unexpected given the wider political environment and the fact that the first HDT was also published late.

3.2 The HDT is based on housing delivery data that we submit to central government. We can use that data to anticipate what the likely result of the second HDT will be. In addition to this there have been a number of Planning articles[1] that have published preliminary results based on their own research[2] of what they anticipate the results to be. Whilst these assessments may contain a degree of error, they nevertheless provide an indication of our performance.

3.3 The table below sets out what the results (or forecasts) of the HDT and the possible implications:

[1] The technical periodical “Planning” Magazine and the multi-discipline practice Savills.
[2] Their research utilises the same statistical data submitted to the Second Test, which is publically available.

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total	Results and what they mean
2018 HDT								
Required	**381**	**383**	**418**				**1177**	Delivery Test Thresholds: >95% =Pass <95% Action Plan <85% 20% Buffer <25% Presumption in favour of sustainable development
Delivered	**199**	**308**	**160**				**667**	
Result							**57%**	**Action Plan** **20% Buffer**
2019 HDT								
Required		**383**	**418**	**579**			**1380**	Delivery Test Thresholds: >95% Delivery=Pass <95% Action Plan <85% 20% Buffer <45% Presumption in favour of sustainable development
Delivery		**308**	**160**	**165**			**633**	
Result							**46%**	**Action Plan** **20% Buffer**
2020 HDT								
Required			**418**	**579**	**579**		**1576**	Delivery Test Thresholds: >95% Delivery=Pass <95% Action Plan <85% 20% Buffer <75% Presumption in favour of sustainable development
Forecasted delivery			**160**	**165**	**119**		**444**	
Result							**28%**	**Action Plan** **20% Buffer** **Presumption**
2021 HDT								
Required				**579**	**579**	**579**	**1737**	Delivery Test Thresholds: >95% Delivery=Pass <95% Action Plan <85% 20% Buffer <75% Presumption in favour of sustainable development
Forecasted delivery				**165**	**119**	**214**	**498**	
Result							**29%**	**Action Plan** **20% Buffer** **Presumption**

3.1 To provide some context, the 2018 HDT results meant that 105 authorities had to prepare an Action Plan and of these, 84 were required to add a 20% buffer to their five year land supply. We were one of the 84 authorities where both these measures applied. In terms of performance against the other authorities, we came 22nd of the worst performing against their housing requirement compared with other authorities (310 authorities). We are predicted to slip further down the list of the worst performing authorities in terms of housing delivery in future years if no action is taken.

3.2 Although we have not been caught by NPPF Paragraph 11 "The presumption in favour of sustainable development" through the result of the HDT; "the presumption in favour of sustainable development" nevertheless applies in Epsom and Ewell because we are unable to demonstrate a five year supply of housing land.

3.3 The latest annual monitoring report shows that the Council can only demonstrate a 1.14 years supply of housing; and in future years it is likely to be below the HDT threshold whereby the "presumption in favour of sustainable development" would apply also. This means that we are not delivering sufficient housing to meet local needs and we are also not demonstrating there is sufficient supply in the pipeline to meet future need.

3.4 This has significant implications for our plan-making and decision-taking processes, particularly in regards to speculative applications that come forward.

3.5 In order to alleviate the pressure of speculative planning applications, it is vital that we maintain progress in preparing and producing an up-to-date development plan. This must include relevant strategic and general policies, and site allocations that positively respond to proposals for new additional homes.

3.6 It is also important that we closely monitor the progress on the Actions identified in the Housing Delivery Action Plan and identify if there are other interventions that we can introduce and implement in order to stimulate housing delivery across the Borough.

4 Financial and Manpower Implications

4.1 The resource implications related to the Local Plan and the Housing Delivery Action Plan have been factored into project management by Officers in conjunction with other work within the planning policy team.

4.2 ***Chief Finance Officer's comments:***

5 Legal Implications (including implications for matters relating to equality)

5.1 Paragraph 73 of the National Planning Policy Framework sets out the requirement to identify a minimum of five years supply of specific deliverable sites against their housing requirement and the buffer that should be applied depending on the circumstances of the planning authority.

5.2 Paragraph 75 of the National Planning Policy Framework sets out the requirement to prepare an Action Plan to assess the causes of under delivery and to identify actions to increase delivery in future years if the Council has not delivered more than 95% of it housing requirement over the previous three years.

5.3 ***Monitoring Officer's comments: none arising from the contents of this report.***

6 Sustainability Policy and Community Safety Implications

6.1 The new Local Plan will contribute towards delivering the Council's objectives and priorities. This will be supported by a Sustainability Appraisal to appraise the social, environmental and economic effects in order to ensure its policies work towards achieving sustainable development.

7 Partnerships

7.1 None for the purpose of this report

8 Risk Assessment

8.1 The 'presumption in favour of sustainable development' already applies to Epsom & Ewell as a result of our not being able to demonstrate a five year land supply of housing requirement. It is likely that the 'presumption' will also apply as a result of under delivery.

8.2 This puts us at immediate risk of speculative planning proposals coming forward. It is important that we prepare a sound and up-to-date Local Plan in a timely manner to ensure that future development continues to 'Plan Led' and not the result of ad-hoc decision-taking.

9 Conclusion and Recommendations

9.1 The Committee notes the forecasted result for Epsom and Ewell in the government's forthcoming Housing Delivery Test for 2019 and the implications that this will have on the local planning authority's plan-making and decision-taking processes.

Ward(s) affected: (All Wards);

LOCAL PLAN DESIGN POLICIES

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annex 1 Development Plan Design Policies Annex 2 National Design Guide MHCLG 2019 Annex 3 Councillor's Companion for Design in Planning MHCLG Design Network
Other available papers (not attached):	Reports to Licensing and Planning Policy, 8 May 2018, 14 November 2019

Report summary

A well-design borough that provides for the needs of the community, improves neighbourhoods, and enhances quality places and the lives of our residents is key to good planning.

The Local Development Plan includes a number of Design Policies, which along with the National Planning Policy Framework, associated planning guidance, and the National Design Guidance published in October 2019, inform policy and decision making.

The report sets out the extent of proposed design policies for the new Local Plan, and addresses the need for planning balance exercise when determining planning applications.

Recommendations:

The Committee are requested to:

(1) note the publication of the National Design Guidance and associated 10 characteristics which are used when assessing and determining planning applications.

(2) agree the key areas of focus of proposed policies being prepared for the Regulation 18 consultation for the draft Local Plan as set out in paragraph.3.7 of this report

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

1.1 The preparation of the new Local Plan contributes towards all of the Council's Key Priorities. The new Local Plan will shape the borough and ensure a well-designed sustainable approach to future development.

2 Background

2.1 Having a well-designed borough that provides for the needs of the community, improves neighbourhoods, and enhances quality of places and the lives of our residents is key to good planning. Well-designed places enhance and enable our health and well-being, feelings of safety, security, inclusion and belonging and our sense of community cohesion.

2.2 On this basis the borough has identified design principles of character, height and density in its 6 principles which will form the basis of the housing strategy for the new Local Plan.

2.3 With the architectural design of many current planning proposals attracting wide public comment, it is timely to set out in this report the existing design policies, the national design guidance, our approach to design and policy making, and design and decision making. The design process and tools that are used when assessing proposals is also detailed.

Development Plan

2.4 The existing Development Plan comprises the Core Strategy 2007, Plan E 2011: Area Action Plan for the Town Centre and the Development Management Policies 2015. The Development Plan also includes the Surrey Minerals Plan and Waste Plan, however they are not material to this report.

2.5 Planning legislation requires that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise.

2.6 The Development Plan includes a number of policies which protect, enhance or enable well-designed places. Annex 1 tabulates all of the existing policies in the Development Plan that enhance, enable or protect matters in relation to design. These are the policies for decision making that have been tested through planning appeals, and have been subject to monitoring as part of the Annual Monitoring Report.

2.7 Annex 1 demonstrates that design goes to the heart of many of the existing policies, the breadth of matters which are protected, enhanced or enabled by the Development Plan sets a clear record that the borough has been concerned on these matters for some time.

National Planning Policy Framework

2.8 When the revised draft National Planning Policy Framework (NPPF) consultation commenced, it became clear that it would have a significant impact on the borough. The impact at Epsom and Ewell Borough would be through the national imposition of the standard method objectively assessed housing need, which would remove the five year housing land supply and in so doing, engage the presumption in favour of sustainable development.

2.9 The significance of the absence of a five year land supply is addressed in a further section of this report. Alongside the imposition of the standard method, the NPPF strengthened chapters on promoting the effective and efficient use of land. Given the limited extent of brownfield land supply, available and deliverable sites in the existing urban area, the borough is under acute pressure to optimise the use of land, as set out in paragraph 123 of the NPPF.

2.10 While the public focus has been on the standard method housing number, the impact that the draft revision of the NPPF would have on the design of the borough would come to be understood, with wider effect.

2.11 On the 8th May 2018 the Licencing and Planning Policy Committee (LPPC) considered a report titled 'Making Efficient Use of Land – Optimising Housing Delivery'. The report explained that optimised use of land is a material planning consideration and that through its introduction the revised NPPF would give rise to policy conflicting demands from different use, densities and building heights.

2.12 The decision of LPPC was to acknowledge the national and local material considerations in relation to the housing need, housing land supply, and the need to optimise development land and that due weight be attached to these matters when assessing planning applications against current adopted local policies.

2.13 For clarity, the decision confirmed the absence of a five year housing land supply, the need to optimise sites being a material planning consideration, and accordingly reinforcing Core Strategy policy CS5 that states that 'all developments should make efficient use of land and have regard to the need to develop land in a comprehensive way'.

2.14 The Borough's adopted policies, which are saved, direct and shape development in the borough to the extent that they conform with the NPPF, where non conformity arises the NPPF will take precedence.

2.15 For that reason, the report to LPPC of 8th May 2018, in paragraph 3.3, explains that when reaching balanced decisions greater weight may be attributed to the need to deliver homes, subject to conformity with other relevant policies. The report also states that by example, this may result in development that exceeds the density and / or height parameters of Policy DM11, Policy DM13 and Plan E Policy E7.

2.16 The strength of Policy DM11, Policy DM13 and Plan E Policy E7 has not been tested at planning appeal. The policies have not been removed, they remain however officers have advised that in reaching a balanced decision, in the absence of a five year housing land supply, conformity with the NPPF is a material consideration. Each case needs to be considered on its own merits.

2.17 On the 14th November 2019, LPPC considered the report which led to the adoption of Six Principles for setting the strategic direction for the new Local Plan's growth strategy, which along with the Borough-wide Masterplan aims at achieving the requirements of the NPPF.

Design Process and Tools

2.18 Paragraphs 39-46 of the NPPF set out the importance of pre-application engagement and front loading with decision making. The more issues that can be resolved at a pre-application stage, the greater the benefits of the proposal.

2.19 Urban design principles key for a site, or the architectural design of a proposal, are issues which applicants are encouraged to explore through the pre-application process. Design is an iterative process, meaning that proposals evolve, are adjusted and moulded to ensure the best design outcome is secured for a site.

2.20 During the pre-application stage developers are encouraged to explore design issues through the Design Review Panel where appropriate. At Epsom and Ewell we encourage applicants to pay for the Design South East Panel.

2.21 The Panel convene in the Borough, are presented the proposal, explore the key technical issues being raised, and provide written advice for the proponent to consider in progressing an iteration, or arriving at the best outcome for the site. The Design Review Panel written advice note is publicly available once the planning application is live, however during the pre-application process the comments are confidential, as with any pre-application advice.

2.22 Other tools available when assessing proposals include a Design Access Statement (DAS) that sets out the evolution and design considerations of the proposal. This is a key document which is required for major developments, proposals for one dwelling or more, or buildings being 100m2 or more in a conservation area, and applications for listed building consent. A DAS should be proportionate to the complexity of the application. The requirement for a DAS comes from the national validation list.

Design and Decision Making

2.23 The Development Plan provides many policies which protect, enhance and enable well-designed places. This report is supported by Annex 1 which sets out where key design words appear in policies, demonstrating the breadth of the matters in place for determining planning applications.

2.24 While the Development Plan has primacy in decision making, the NPPF is a material consideration and in Chapter 2 sets out how to achieve well-designed places. The whole chapter is not repeated in this report, however it should be noted that its guidance is key for making defensible decisions.

2.25 The absence of a five year housing land supply means that paragraph 11 of the NPPF is engaged, and footnote 7 applies. Paragraph 11(d)(ii) clearly states that applications should, in these circumstances, be favourably determined, unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

2.26 This means that notwithstanding the absence of a five year housing land supply, should a scheme before the authority be of such a poor design, without adequate benefits to outweigh that design, the planning balance may be such that the development should be refused. A planning balance exercise is key when making decisions on applications. Paragraph 130 of the NPPF expands on permission being refused for development of poor design.

2.27 Annex 3 is a Councillor's Companion for Design in planning, prepared by MHCLG, which provides helpful guidance in relation to the NPPF and decision making on design matters.

3 Proposals

National Design Guidance

3.1 MHCLG published a National Design Guide in October 2019, refer to Annex 2. The purpose of the National Design Guide is to illustrate how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

3.2 The guidance sets out 10 characteristics that form good design, these being; context, identity, built form, movement, nature, public access, uses, homes and buildings, resources and lifespan.

3.3 The National Design Guide is the most up to date form of design guidance available nationally, and to the borough, which along with the NPPF and the Development Plan, comprehensively inform design decisions.

3.4 It is recommended that LPPC acknowledge the 10 characteristics within the guidance as being those which where relevant are used when assessing planning applications going forward.

3.5 The guidance forecasts the production of a National Model Design Code that will set out detailed standards for key elements of successful design. MHCLG advise that this will be subject to consultation.

Design and Policy Making

3.6 The new Local Plan will propose a number of policies that will be subject to public consultation in 2020. Officers are working to prepare design policies that secure well-designed places.

3.7 The policies being developed, for consultation are proposed to include the following key areas of focus:

- Design – addressing height with taller buildings being in appropriate and sustainable locations rather than a single height approach across the borough. The policy would incorporate the 10 characteristics of well-designed places.

- Character – securing quality design to enhance and complement local character, integrating into existing areas, both town and landscape. How we secure development of the right quality level in the borough is being explored, and through consultation, aspects of quality which are locally important will be confirmed.

- Density – densities are proposed to be based on the location of sites in the context of local services and facilities. Appropriate density of development will be determined by the visual character and appearance of the wider townscape and site constraints.

- Heritage – incorporating the boroughs conservation areas, listed buildings, locally listed heritage assets, and veteran trees this policy would seek to protect, maintain, and enhance.

- Building Standards – incorporating the nationally prescribed space standards, a local private amenity space standard, a percentage of new housing to be wheelchair accessible and fully adaptable, sustainable design and construction to secure carbon neutral homes and for non-residential buildings, including re-using and recycling.

- Trees and landscape – landscaping proposals to be a key component of development proposals incorporating native species with adaptability to the impacts of climate change.

4 Financial and Manpower Implications

4.1 There are no financial or manpower implications from the contents of this report.

4.2 ***Chief Finance Officer's comments***

5 Legal Implications (including implications for matters relating to equality)

5.1 There are no legal implications arising from the contents of this report.

5.2 ***Monitoring Officer's comments:*** *none arising from the contents of this report.*

6 Sustainability Policy and Community Safety Implications

6.1 Well-designed places enhance and enable our health and well-being, feelings of safety, security, inclusion and belonging and our sense of community safety cohesion. Securing well-designed places contributes towards delivering the Council's objectives.

7 Partnerships

7.1 None for the purposes of this report.

8 Risk Assessment

8.1 The design of development proposals can be influenced through the pre-application process. Pre-application is not a compulsory process, therefore some applicants leave negotiation on matters of design to the assessment of the application. This often leads to high levels of public comment and elevated concern.

8.2 A planning balance exercise needs to be undertaken as part of defensible decision making where matters of poor design are being given great weight in the absence of a five year housing land supply.

9 Conclusion and Recommendations

9.1 The Committee are requested to note the publication of the National Design Guidance and associated 10 characteristics which are used when assessing and determining planning applications.

9.2 The Committee are requested to agree the key areas of focus of proposed draft policies being prepared for the Regulation 18 consultation for the draft Local Plan.

Ward(s) affected: (All Wards);

ANNEX 1 – DEVELOPMENT PLAN
RELEVANT POLICIES AND DESIGN KEY WORDS

Planning Instrument and relevant design policy	Design Key Words
Core Strategy 2007	
CS1	Development contribute positively; social economic and environmental improvements; sustainable development; protect and enhance the natural and built environments; high quality sustainable environment; protect the quality of life.
CS4	Open space and recreation in new residential developments
CS5	Protect and enhance heritage assets conservation areas, archaeological remains, ancient monuments, park and gardens of historic interest, and other areas of special character; settings of assets will be protected and enhanced; high quality inclusive design; attractive safe functional public and private environments; reinforce local distinctiveness; complement attractive characteristics of borough; efficient use of land.
CS6	Sustainable construction and design; energy efficiency of development; layout, building design and orientation; SUDS; renewable energy incorporated in design.
CS8	Higher density development to central locations, such as Epsom town centre and other local centres, close to existing services and facilities and accessible by public transport, walking and cycling. Lower densities to be applied in other parts of the built up area to help retain their character.
CS14	Measures to improve Epsom town centre, conserving and developing sense of place, pedestrian and cyclist new links; spatial structure of town protect and enhance; safety and security for users; inclusive and safe.
CS16	Develop opportunities for public transport and enhance pedestrian environment; high quality public realm.
Plan E Action Plan	
E7	Town centre building height, character of area, streetscene, conservation area, listed buildings and topography.

E8	New developments to incorporate renewable energy generation where feasible
E9	Public realm, high quality, well designed, well connected, improve character, appearance and attractiveness of Town Centre
Site allocations	All of these provide design guidance relevant to enable the site to come forward for development.
Development Management Policies Document	
DM8	Resist loss of heritage assets, conserve and enhance in new development.
DM9	Positive contribution to visual character and appearance; connection with surroundings; appropriate materials.
DM10	Principles of good design, development typology, prevailing density, scale, layout, height, form, massing, spaces, building lines, architectural design details; adaptable, reduce risk of fear; amenities, layout and access.
DM11	Efficient use of development sites; density of development to maintain and enhance visual character; density in most cases not exceed 40 dph exemptions permitted.
DM12	Housing standards
DM13	Building heights set out with factors to be respected listed including character, streetscene, conservation area, listed buildings and topography.
DM14	Shopfront design
DM15	Advertisements and hoardings
DM16	Design of backland development
DM36	Sustainable transport in new developments
DM37	Parking standards and design
DM38	Design of rear servicing

National Design Guide

Planning practice guidance for beautiful, enduring and successful places



Ministry of Housing,
Communities &
Local Government

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October 2019

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Context

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- C2 Value heritage, local history and culture 12

Identity

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- I2 Well-designed, high quality and attractive 15
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- B1 Compact form of development 19
- B2 Appropriate building types and forms 19
- B3 Destinations 20

Movement

- M1 An integrated network of routes for all modes of transport 23
- M2 A clear structure and hierarchy of connected streets 23
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Nature

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Public spaces

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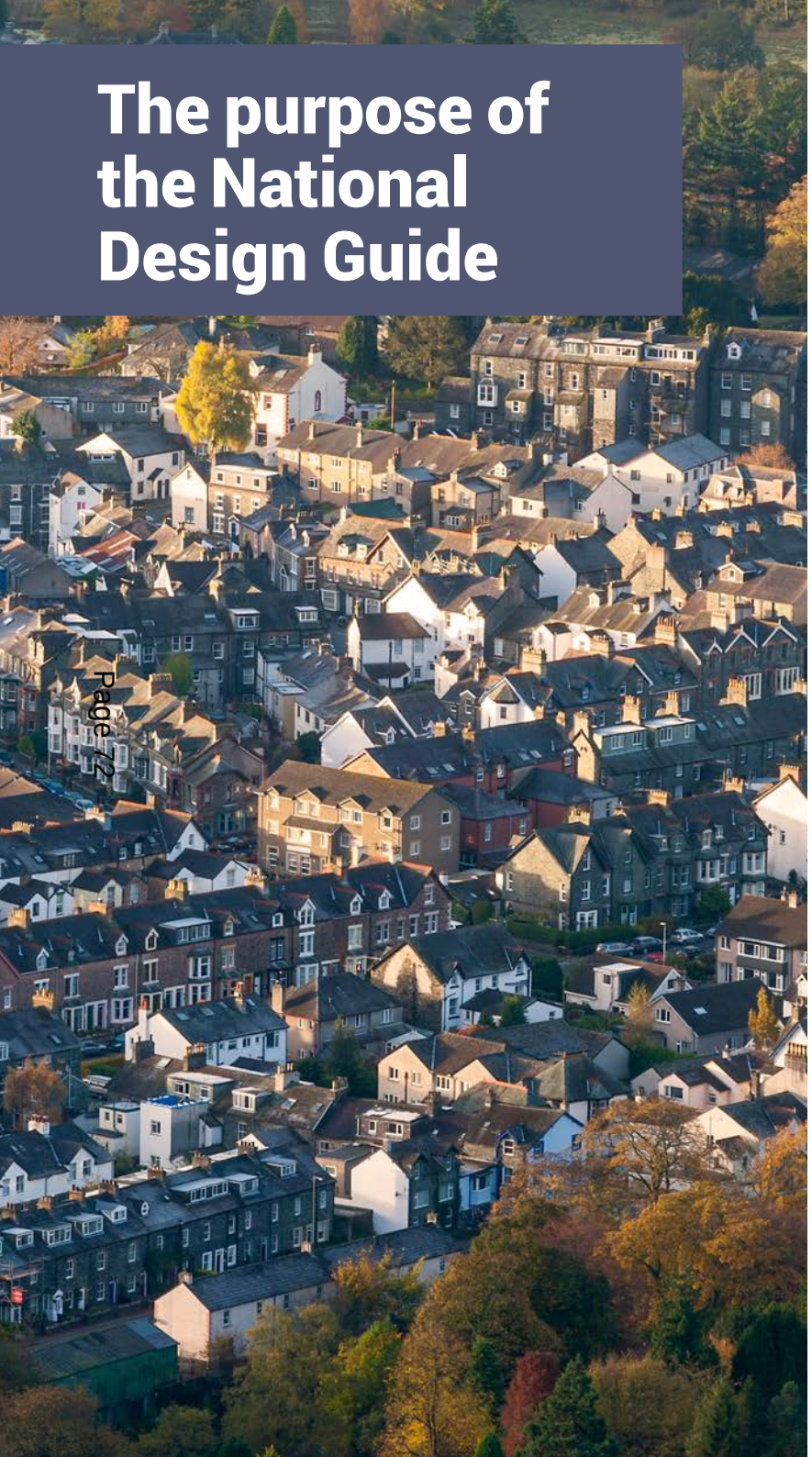
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Part 1:

The purpose of the National Design Guide



The purpose of the National Design Guide



1 Places affect us all – they are where we live, work and spend our leisure time. Well-designed places influence the quality of our experience as we spend time in them and move around them. We enjoy them, as occupants or users but also as passers-by and visitors. They can lift our spirits by making us feel at home, giving us a buzz of excitement or creating a sense of delight. They have been shown to affect our health and well-being, our feelings of safety, security, inclusion and belonging, and our sense of community cohesion.

2 They function well, accommodating businesses, homes and a range of other uses and activities that support our everyday lives. Well-designed places can last for many years.

3 The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. This design guide, the National Design Guide, illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

Introduction

4 The long-standing, fundamental principles for good design are that it is: fit for purpose; durable; and brings delight[1]. It is relatively straightforward to define and assess these qualities for a building. We can identify its activities and users, the quality of detail, materials, construction and its potential flexibility. We can also make judgements about its beauty.

5 A place is more complex and multi-faceted than a building:

- it is a setting for a diverse range of uses and activities, and is experienced by many people in many different ways;
- it is made up of buildings, and also landscape and infrastructure, which are likely to endure longer than the buildings themselves;
- most places evolve over a long period of time once they have been established, with many incremental changes that can affect their quality;
- the quality of 'delight' includes a richness of experience gained from all of our senses, not only the visual; and
- beauty in a place may range from a long view down to the detail of a building or landscape.

[1] *Originally from Vitruvius*

6 The National Planning Policy Framework sets out that achieving high quality places and buildings is fundamental to the planning and development process. It also leads to improvements in the quality of existing environments. The National Planning Policy Framework expands upon the fundamental principles of good design to define what is expected for well-designed places and explain how planning policies and decisions should support this.

7 The National Planning Policy Framework is supported by a suite of planning practice guidance that is relevant to both design quality and quality in delivery. See **Part 3: References**.

8 The underlying purpose for design quality and the quality of new development at all scales is to create well-designed and well-built places that benefit people and communities. This includes people who use a place for various purposes such as:

- to live, work, shop, for leisure and recreation, and to move around between these activities; and
- those who visit or pass through.

It also includes people at different stages of life and with different abilities – children, young people, adults, families and older people, both able-bodied and disabled.

9 The National Design Guide addresses the question of how we recognise well-designed places, by outlining and illustrating the Government's priorities for well-designed places in the form of ten characteristics. See **Part 2: The ten characteristics**.

10 It is based on national planning policy, practice guidance and objectives for good design as set out in the National Planning Policy Framework. Specific, detailed and measurable criteria for good design are most appropriately set out at the local level. They may take the form of local authority design guides, or design guidance or design codes prepared by applicants to accompany planning applications.

Definitions

Inclusion: Making sure that all individuals have equal access, opportunity and dignity in the use of the built environment.

Community cohesion: A sense of belonging for all communities, with connections and trust between them. Diversity is valued and people of different backgrounds have the opportunity to develop positive relationships with one another.

How to use this design guide

11 The focus of this design guide is on good design in the planning system, so it is primarily for:

- local authority planning officers, who prepare local planning policy and guidance and assess the quality of planning applications;
- councillors, who make planning decisions;
- applicants and their design teams, who prepare applications for planning permission; and
- people in local communities and their representatives.

Definitions

A design guide: A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.

A design code: A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

As well as helping to inform development proposals and their assessment by local planning authorities, it supports paragraph 130 of the National Planning Policy Framework which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

12 The terminology used here avoids jargon where possible. Definitions are provided where particular technical language is needed for clarity and precision. They can generally be found in the section where the term is used for the first time.

13 In a well-designed place, an integrated design process brings the ten characteristics together in a mutually supporting way. They interact to create an overall character of place.

14 Good design considers how a development proposal can make a contribution towards all of them. This applies to proposals of all sizes, including small scale incremental changes (such as highway works), new buildings, infill developments, major developments and larger scale developments such as urban extensions, new neighbourhoods, new settlements and infrastructure.

15 At an early stage of the design process, the relative priority for different characteristics may be discussed and agreed. The most relevant characteristics will be determined by a number of considerations:

- locally identified priorities and concerns;
- the strategic priorities of the local authority;
- the priorities of a particular user group;
- the scale of proposal;
- its site and location; and/or
- the design process, including whether it is at a strategic or detailed stage.

16 Well-designed places and buildings come about when there is a clearly expressed 'story' for the design concept and how it has evolved into a design proposal. This explains how the concept influences the layout, form, appearance and details of the proposed development. It may draw its inspiration from the site, its surroundings or a wider context. It may also introduce new approaches to contrast with, or complement its context. This 'story' will inform and address all ten characteristics. It is set out in a Design and Access Statement that accompanies a planning application.

17 Local communities can play a vital role in achieving well-designed places and buildings and making sure there is a relationship between the built environment and quality of life. Communities can be involved in design processes through approaches such as co-design, design workshops and other engagement techniques, so that places and buildings reflect local community preferences, improve their quality of life and fit well into their surroundings. The design-related chapters of the planning practice guidance explain these and other design processes.

Definitions

Design concept: The basic design ideas on which a proposal will be based, often expressed in a combination of words and visual material.

Design and Access Statement: A short report accompanying and supporting a planning application. It provides a framework for applicants to explain how a proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users.

Looking forward

18 This guide has been prepared in the context of social, economic and environmental change. Technological change is rapid, with developments in digital, artificial intelligence and machine learning affecting our lives at all scales, both inside and outside the home. Demographics are also driving change, with an ageing population. Younger people's expectations are changing too. This is leading to new lifestyles and new models of home ownership. It includes more communal forms of living, such as cohousing. New models of development are also emerging, driven by advanced technologies. These include new off-site production methods, the use of digital technologies for production and customisation, and an increase in self- and custom-build.

19 We expect continuing change as a consequence of climate change, changing home ownership models and technological changes. It is likely to emerge and embed in society rapidly. It will influence the planning, design and construction of new homes and places. So, for each of the ten characteristics, a Looking Forward box identifies some issues to consider as we are thinking ahead about our places. Both local planning policies and the design process need to take these into account.

Components for good design

20 Buildings are an important component of places and proposals for built development are a focus of the development management system. However good design involves careful attention to other important components of places. These include:

- the context for places and buildings;
- hard and soft landscape;
- technical infrastructure – transport, utilities, services such as drainage; and
- social infrastructure – social, commercial, leisure uses and activities.

21 A well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings. It comes about through making the right choices at all levels, including:

- the layout (or masterplan);
- the form and scale of buildings;
- their appearance;
- landscape;
- materials; and
- their detailing.

22 All developments are made up of these components put together in a particular way. The choices made in the design process contribute towards achieving the ten characteristics and shape the character of a place.

Layout

23 A layout shows how routes and blocks of development are arranged and relate to one another to create streets, open spaces and buildings. It defines:

- the structure or settlement pattern;
- the grain, or the pattern of development blocks and plots; and
- the broad distribution of different uses, and their densities or building heights.

Form

24 Form is the three-dimensional shape and modelling of buildings and the spaces they define. Buildings and spaces can take many forms, depending upon their:

- size and shape in plan;
- height;
- bulk - their volume; and
- massing - how the bulk is shaped into a form.

In the case of spaces, their form is influenced by the buildings around them.

25 The form of a building or a space has a relationship with the uses and activities it accommodates, and also with the form of the wider place where it is sited.

Scale

26 Scale is the height, width and length of each building proposed within a development in relation to its surroundings. This relates both to the overall size and massing of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. It affects how a space can be used and how it is experienced. The relationships between the different dimensions of a building or component are known as its proportions.

Appearance

27 Appearance is the aspects of a building or space within the development which determine the visual impression the building or space makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture. In the case of a space, its landscape also influences its appearance.

Landscape

28 Landscape is the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site, the area in which it is situated and the natural environment. Landscape includes landform and drainage, hard landscape such as surfacing, boundary treatments, street furniture and play equipment. It also includes soft landscape – trees, shrubs and other planting.

Materials

29 The materials used for a building or landscape affect how well it functions and lasts over time. They also influence how it relates to what is around it and how it is experienced. The scale, form and appearance of a building influence what materials may be appropriate for its construction. Materials should be practical, durable, affordable and attractive. Choosing the right materials can greatly help new development to fit harmoniously with its surroundings.

30 Innovative materials and construction techniques are being developed all the time. Modern methods of construction are becoming more common, whether in the form of mass production for modular construction, or off-site bespoke construction for self- or custom-build.

Detailing

31 The details of a building are the individual components and how they are put together. Some are a deliberate part of the appearance of a building, including doors, windows and their surrounds, porches, decorative features and ironmongery. Others are functional, although they can also contribute to the appearance of a building. These include lighting, flues and ventilation, gutters, pipes and other rainwater details.

32 Detailing affects the appearance of a building or space and how it is experienced. It also affects how well it weathers and lasts over time.

The relationship between the National Design Guide and local design guides

33 This document is set out in four parts:

- this part, Part 1, outlines the purpose of the National Design Guide;
- Part 2 sets out the ten characteristics of beautiful, enduring and successful places;
- Part 3: National Model Design Code (to follow); and
- Part 4 provides sources of reference relevant to Part 2, including to other guidance and the good practice examples featured, as well as cross references to the National Planning Policy Framework and planning practice guidance.

34 The National Design Guide provides a structure that can be used for the content of local design guides, and addresses issues that are important for design codes where these are applied to large scale development on single or multiple sites. The ten characteristics reflect the Government's priorities and provide a common overarching framework. More specific guidance and codes can then be locally formulated to meet the priorities of local communities. All local design guides and codes will need to set out a baseline understanding of the local context and an analysis of local character and identity. This may include (but not be limited to) the contribution made by the following:

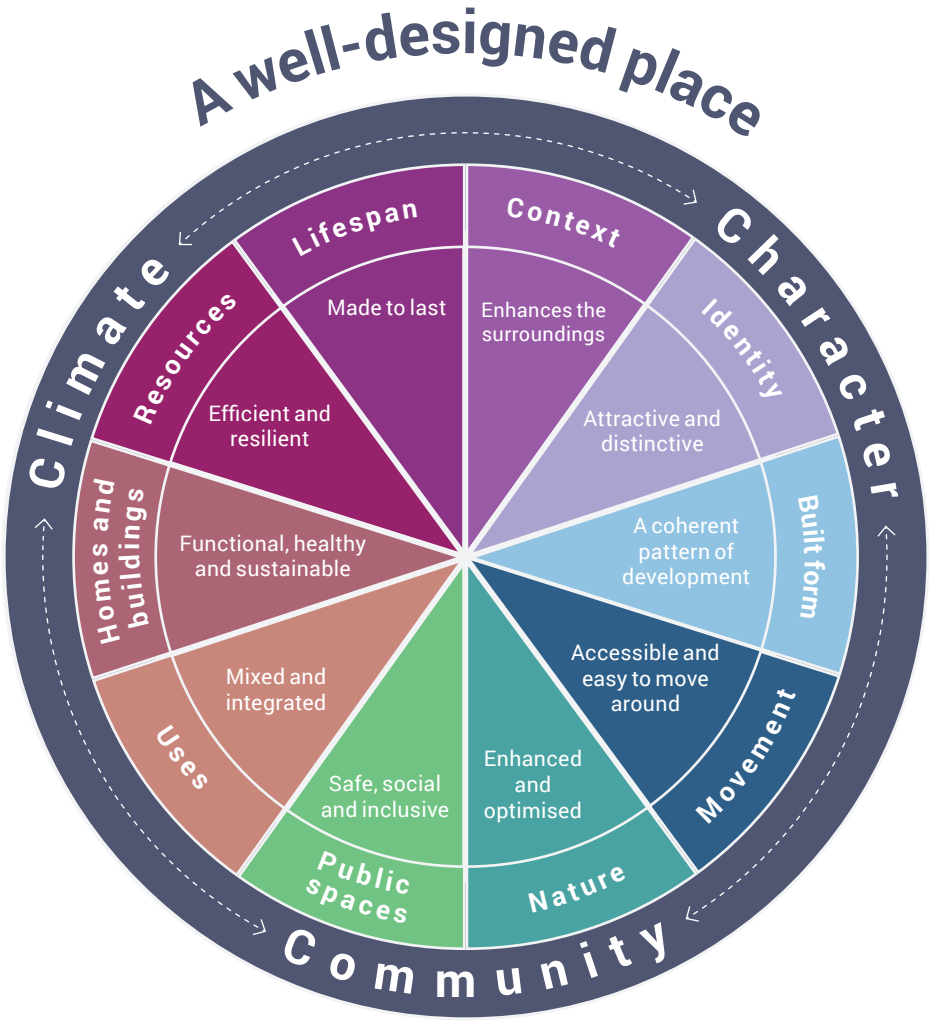
- the relationship between the natural environment and built development;
- the typical patterns of built form that contribute positively to local character;
- the street pattern, their proportions and landscape features;
- the proportions of buildings framing spaces and streets;
- the local vernacular, other architecture and architectural features that contribute to local character.

Introducing the ten characteristics

35 Well-designed places have individual characteristics which work together to create its physical **Character**. The ten characteristics help to nurture and sustain a sense of **Community**. They work to positively address environmental issues affecting **Climate**. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework.

36 The ten characteristics set out in Part 2 are:

- **Context** – enhances the surroundings.
- **Identity** – attractive and distinctive.
- **Built form** – a coherent pattern of development.
- **Movement** – accessible and easy to move around.
- **Nature** – enhanced and optimised.
- **Public spaces** – safe, social and inclusive.
- **Uses** – mixed and integrated.
- **Homes and buildings** – functional, healthy and sustainable.
- **Resources** – efficient and resilient.
- **Lifespan** – made to last.



The ten characteristics of well-designed places

Part 2:

The ten characteristics



Context

Enhances the surroundings



37 **Context** is the location of the development and the attributes of its immediate, local and regional surroundings.

38 An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion.

39 Well-designed places are:

- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
- integrated into their surroundings so they relate well to them;
- influenced by and influence their context positively; and
- responsive to local history, culture and heritage.

*The topography, landscape character, cultural history and built form all define the context for **Ilkley, West Yorkshire.***

C1 Understand and relate well to the site, its local and wider context

40 Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

- the existing built development, including layout, form, scale, appearance, details, and materials;
- local heritage – see below – and local character – see **Identity**;
- landform, topography, geography and ground conditions;
- landscape character, drainage and flood risk, biodiversity and ecology;
- access, movement and accessibility;
- environment – including landscape and visual impact, microclimate, flood risk, noise, air and water quality;
- views inwards and outwards;
- the pattern of uses and activities, including community facilities and local services; and
- how it functions.

Others are non-physical, such as:

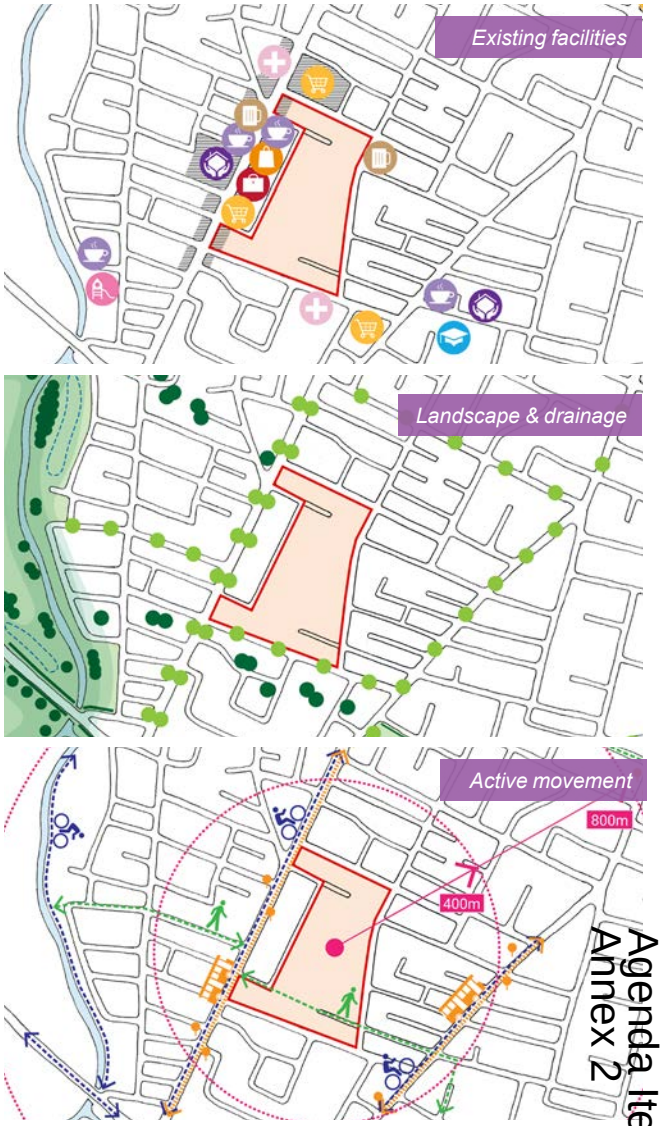
- social characteristics, including demographics;
- economic factors; and
- the aspirations, concerns and perceptions of local communities.

41 Well-designed development proposals are shaped by an understanding of the context that identifies opportunities for design as well as constraints upon it. This is proportionate to the nature, size and sensitivity of the site and proposal. A simple analysis may be appropriate for a small scale proposal. Baseline studies covering a wide range of topics are likely to be required for a larger scale development.

42 Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation, including:

- the landscape character and how places or developments sit within the landscape, to influence the siting of new development and how natural features are retained or incorporated into it;
- patterns of built form, including local precedents for routes and spaces and the built form around them, to inform the layout, form and scale – see **Built form**;
- the architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character, to inform the form, scale, appearance, details and materials of new development – see **Identity**.

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Identifying the existing features of the site and the wider area highlights opportunities for the design of new developments to link well into their context and enhance these features for the benefit of new and existing residents.

- uses and facilities, including identifying local needs and demands that well-located new facilities may satisfy; and
- public spaces, including their characteristic landscape design and details, both hard and soft.

43 However, well-designed places do not need to copy their surroundings in every way. It is appropriate to introduce elements that reflect how we live today, to include innovation or change such as increased densities, and to incorporate new sustainable features or systems.

44 To communicate the benefits of a scheme, it is important to explain how the design of a development relates to context and local character.

C2 Value heritage, local history and culture

45 When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.

46 Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.

47 Well-designed places and buildings are influenced positively by:

- the history and heritage of the site, its surroundings and the wider area, including cultural influences;
- the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;
- the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.

48 Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century.

Definitions

Baseline studies: Descriptions of the conditions as existing or committed (e.g. environmental), against which changes arising from a proposed development are predicted and assessed.

Local vernacular: An indigenous building style using local materials and traditional methods of construction and ornament, especially as distinguished from academic or historical architectural styles.



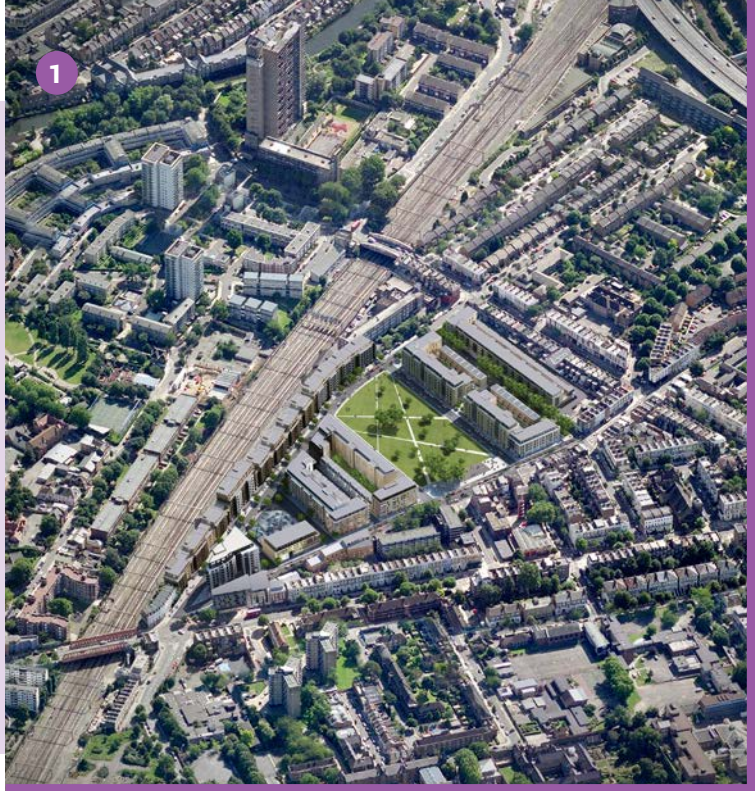
New development relates well to Grade II listed buildings in an historic harbour-side conservation area. Residential buildings are designed as courtyard blocks with familiar roof forms around new pedestrian and cycle-focused streets. ***Wapping Wharf, Bristol***

Good practice examples

1 *This development relates well to its context in terms of its layout, scale and massing as well as the location of open space and infrastructure. It respects the existing urban grain to create new streets and a new London square, a familiar type of open space in this west London context.* ***Portobello Square, Kensington, London****.*

2 *New homes relate positively to their historic town setting. The proportions of buildings, their openings and their materials all complement and enhance the context.* ***The Piggeries, Frome, Somerset.***

3 *Historic streets are reintroduced to create permeable and well-sized urban blocks. The new housing creates a positive setting for several listed buildings.* ***Timekeepers Square, Salford.***







Looking forward

Have you considered:

- ☐ How climate and environmental change influences your understanding of context?
- ☐ Are there opportunities for flood alleviation? Net environmental gain? Absorption of CO_2? Reducing embodied carbon by retaining existing buildings?
- ☐ How emerging modes of transport and infrastructure may influence accessibility?
- ☐ How heritage may be incorporated into proposals so it is inclusive and accessible to all?

Identity

Attractive and distinctive



49 The **identity** or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings or how a place looks, but how it engages with all of the senses. Local character makes places distinctive. Well-designed, sustainable places with a strong identity give their users, occupiers and owners a sense of pride, helping to create and sustain communities and neighbourhoods.

50 Well-designed places, buildings and spaces:

- have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing towards health and well-being, inclusion and cohesion;
- have a character that suits the context, its history, how we live today and how we are likely to live in the future; and
- are visually attractive, to delight their occupants and other users.

The distinctive character of the buildings and landscape helps to create an identity for this new development. Its design has a strong narrative and clear precedents. ***Derwenthorpe, York.***

I1 Respond to existing local character and identity

51 Local identity is made up of typical characteristics such as the pattern of housing, and special features that are distinct from their surroundings. These special features can be distinguished by their uses and activity, their social and cultural importance, and/or their physical form and design. Most places have some positive elements of character, particularly for their users. These can help to inform the character of a new development.

52 Well-designed new development is influenced by:

- an appreciation and understanding of vernacular, local or regional character, including existing built form, landscape and local architectural precedents;
- the characteristics of the existing built form – see Built form;
- the elements of a place or local places that make it distinctive; and
- other features of the context that are particular to the area – see Context.

This includes considering:

- the composition of street scenes, individual buildings and their elements;
- the height, scale, massing and relationships between buildings;
- views, vistas and landmarks;
- roofscapes;
- the scale and proportions of buildings;
- façade design, such as the degree of symmetry, variety, the pattern and proportions of windows and doors, and their details;
- the scale and proportions of streets and spaces;
- hard landscape and street furniture;
- soft landscape, landscape setting and backdrop;
- nature and wildlife, including water;
- light, shade, sunshine and shadows; and
- colours, textures, shapes and patterns.

I2 Well-designed, high quality and attractive

53 Well-designed places are visually attractive and aim to delight their occupants and passers-by. They cater for a diverse range of residents and other users. All design approaches and architectural styles are visually attractive when designed well.

54 Well-designed places appeal to all our senses. The way a place looks, feels, sounds, and even smells, affects its enduring distinctiveness, attractiveness and beauty.



This neighbourhood in a semi-rural setting draws on local historical precedents to create a distinctive character. It is defined by the height and massing of buildings, variation in roof forms and material selection. Gables are paired to create a focal point and mark the entrance to a street. ***Trowse Newton, Norfolk.***

55 Well-designed places contribute to local distinctiveness. This may include:

- adopting typical building forms, features, materials and details of an area;
- drawing upon the architectural precedents that are prevalent in the local area, including the proportions of buildings and their openings;
- using local building, landscape or topographical features, materials or planting types;
- introducing built form and appearance that adds new character and difference to places;
- creating a positive and coherent identity that residents and local communities can identify with.

56 Materials, construction details and planting are selected with care for their context. They are attractive but also practical, durable and affordable. They contribute to visual appeal and local distinctiveness. In well-designed buildings, the materials and details suit the design concept and they are consistently followed through the construction process to completion.

I3 Create character and identity

57 Design decisions at all levels and scales shape the character of a new place or building. Character starts to be determined by the siting of development in the wider landscape, then by the layout – the pattern of streets, landscape and spaces, the movement network and the arrangement of development blocks. It continues to be created by the form, scale, design, materials and details of buildings and landscape. In this way, it creates a coherent identity that everyone can identify with, including all residents and local communities.

58 Where the scale or density of new development is very different to the existing place, it may be more appropriate to create a new identity rather than to scale up the character of an existing place in its context. New character may also arise from a response to how today's lifestyles could evolve in the future, or to the proposed method of development and construction. Larger scale new developments, such as garden villages or urban extensions, may benefit from a variety of characters so that different areas or neighbourhoods each have their own identity.

59 Where the character of an existing place has limited or few positive qualities, then a new and positive character will enhance its identity.



*A wide street with house frontages stepping down along its length. Their simple forms, considered roof detailing, and colourful façades create a strong identity appropriate to the local and wider context of **Nansledan, Newquay.***

Definitions

Street scene: The appearance of all of the elements of a street, including the carriageway, pavement, street furniture, planting, and the buildings or structures along its edges, particularly the composition of buildings on each side of the street.

Roofscape: A view of roofs, particularly in terms of its aesthetic appeal.

Good practice examples

1 *Apartments designed in a traditional style in response to the local identity. The frontage of the development is designed as a series of façades to create a vertical rhythm along the street and this is reinforced by the composition and proportions of openings.* ***Highbury Gardens, Islington, London.***

2 *Timber cladding, gable ends, a pedestrian-focused public realm and generous planting all give an informal, rural character to this neighbourhood at* ***Abode, Great Kneighton, Cambridge.***

3 *The use of brick cladding on this tall building gives it a character that fits well into its historic surroundings, and a texture that is human scale and tactile where the building meets the ground.* ***Blackfriars Circus, Southwark, London.***







Looking forward

Have you considered:

- ☐ How the identity suits the proposed approach to development such as construction technologies, diversity of procurement or ownership models?
- ☐ How the proposed character responds to climate change?
- ☐ How natural features such as tree planting, wetlands or other sustainable drainage systems can contribute to a positive character and perform a multifunctional role?

Built form

A coherent pattern of development



60 **Built form** is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics. Together they create the built environment and contribute to its character and sense of place.

61 It is relevant to city and town centres, suburbs, villages and rural settlements. It creates a coherent framework that forms a basis for the design of individual developments within a place.

62 Well-designed places have:

- compact forms of development that are walkable, contributing positively to well-being and placemaking;
- accessible local public transport, services and facilities, to ensure sustainable development;
- recognisable streets and other spaces with their edges defined by buildings, making it easy for anyone to find their way around, and promoting safety and accessibility; and
- memorable features or groupings of buildings, spaces, uses or activities that create a sense of place, promoting inclusion and cohesion.

The built form of this urban block is oriented to make the most of views towards the river. It steps to create a varied roof line, so that it sits sensitively in the wider historic industrial context. This helps to manage the levels of a sloping site. It also provides attractive roof terraces for residents. ***The Malings, Ouseburn.***

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B1 Compact form of development

63 Compact forms of development bring people together to support local public transport, facilities and local services. They make destinations easily accessible by walking or cycling wherever this is practical. This helps to reduce dependency upon the private car.

64 Well-designed new development makes efficient use of land with an amount and mix of development and open space that optimises density. It also relates well to and enhances the existing character and context.

65 Built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context. The appropriate density will result from the context, accessibility, the proposed building types, form and character of the development.

B2 Appropriate building types and forms

66 Well-designed places also use the right mix of building types, forms and scale of buildings and public spaces to create a coherent form of development that people enjoy. They also adopt strategies for parking and amenity that support the overall quality of the place.

67 The built form of well-designed places relates well to:

- the site, its context and the opportunities they present;
- the proposed identity and character for the development in the wider place;
- the lifestyles of occupants and other users; and
- resource efficiency, climate change mitigation and adaptation. See **Resources.**

68 Built form defines a pattern of streets and development blocks. Streets are places for people as well as for movement. Street types will depend on:

- their width, relating to their use;
- the height of buildings around them, the relationship with street width, and the sense of enclosure that results;
- how built up they are along their length, and the structure of blocks and routes that this creates;
- the relationship between building fronts and backs, with successful streets characterised by buildings facing the street to provide interest, overlooking and active frontages at ground level - see **Public spaces**; and
- establishing an appropriate relationship with the pattern, sizes and proportions of existing streets in the local area.



Considering the layout, grain and scale of buildings and spaces in different situations, and drawing inspiration from traditional street patterns, helps to create new developments that fit well into the surrounding context.

69 Well-designed tall buildings play a positive urban design role in the built form. They act as landmarks, emphasising important places and making a positive contribution to views and the skyline.

70 Proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; relationship to context; impact on local character, views and sight lines; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character.

B3 Destinations

71 Destinations provide opportunities for people to meet, share experiences and come together as a community. By bringing existing and new together, destinations become a place for everyone.

72 They create valuable opportunities for the built form to strengthen the local character of a place. The choice of site, layout, form and scale of built form, together with good design and well-considered materials, all help to add to local distinctiveness and create a sense of community.

73 In this way, local destinations become recognisable features that help people find their way around and feel a sense of identity. Involving potential users in the design process also helps to achieve this.

Definitions

Accessibility: The ability of people to move around an area and reach places and facilities, including older and disabled people, those with young children and those carrying luggage or shopping.

Compact form of development: Development that is planned with a relatively high residential density and an urban layout. Community facilities are closer to one another and their users, preserves more open landscape, and makes efficient use of land and resources.

Walkable: Local facilities are within walking distance, generally considered to be no more than a 10 minute walk (800m radius).

Destinations: Places or facilities that people want to visit. In a neighbourhood these may be transport hubs, open spaces, local services such as schools, shops, healthcare or community facilities.



The form of these new homes draws from local rural typologies, with a contemporary interpretation. ***Carrowbreck Meadow, Norfolk***



Flats are used to turn the corner of this urban block. Stepped bay windows and a large chimney stack to create a positive and interesting facade treatment on a prominent corner. ***Pottergate, Alnwick, Northumberland***

Good practice examples

1 *This development is designed around a clear street hierarchy, a mix of open spaces and an associated variety of building types and sizes.* ***Great Western Park, Didcot.***

2 *A network of streets and courts frame open spaces that allow views out to the hillside and coastline for existing and new residents. The built form adopts a, contemporary approach to traditional typologies.* ***Officers Field, Weymouth.***

3 *This higher density, urban development uses the size and location of open spaces, layout, orientation and stepping façades and roofs to break up the form.* ***St. Andrews Block B, Bromley-by-Bow, London.***







Looking forward

Have you considered:

- ☐ How the built form reduces reliance upon the car by promoting walking and cycling to local destinations, and prioritising public transport routes?
- ☐ How it can support evolving lifestyles? Working remotely or from home? Intergenerational living? Cohousing?
- ☐ How the layout, form and scale are a suitable starting point for an appropriate character?

Movement

Accessible and easy to move around



Cycle and pedestrian movement that is well-overlooked and attractive. ***Packington Estate, Islington, London.***

74 Patterns of **movement** for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy. They also form a crucial component of urban character. Their success is measured by how they contribute to the quality and character of the place, not only how well they function.

75 Successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries.

76 A well-designed movement network defines a clear pattern of streets that:

- is safe and accessible for all;
- functions efficiently to get everyone around, takes account of the diverse needs of all its potential users and provides a genuine choice of sustainable transport modes;
- limits the impacts of car use by prioritising and encouraging walking, cycling and public transport, mitigating impacts and identifying opportunities to improve air quality;
- promotes activity and social interaction, contributing to health, well-being, accessibility and inclusion; and
- incorporates green infrastructure, including street trees to soften the impact of car parking, help improve air quality and contribute to biodiversity.

M1 An integrated network of routes for all modes of transport

77 A well-designed and connected network gives people the maximum choice in how to make their journeys. This includes by rail, other public transport, walking, cycling and by car. Priority is given to pedestrian and cycle movements, subject to location and the potential to create connections.

78 Prioritising pedestrians and cyclists mean creating routes that are safe, direct, convenient and accessible for people of all abilities. These are designed as part of attractive spaces with good sightlines, so that people want to use them. Public rights of way are protected, enhanced and well-linked into the wider network of pedestrian and cycle routes.

79 In well-designed places, people should not need to rely on the car for everyday journeys, including getting to workplaces, shops, schools and other facilities, open spaces or the natural environment. Higher densities are dependent upon accessibility to public transport and essential facilities. To optimise density, it may be necessary to provide public transport infrastructure or to improve existing local transport services. A transport hub may represent an opportunity for a local increase in density, where appropriate to local context and character.

80 In a well-designed place, all modes of transport are positively designed into the built form. They are integrated into public spaces with character that people enjoy using. People move around in attractive streets and other public spaces - parks, natural open spaces and green corridors.

M2 A clear structure and hierarchy of connected streets

81 A clear layout and hierarchy of streets and other routes helps people to find their way around so that journeys are easy to make. Safe and direct routes with visible destinations or clear signposting encourage people to walk and cycle.

82 Wider, more generous spaces are well-suited to busier streets, including streets served by public transport. They have enough space to create an attractive place for all users. Narrower streets are more suitable where there is limited vehicle movement and speeds are low. Mews, courtyards and culs-de-sac will generally only be appropriate at the most local level where there is little vehicular movement.

83 Well-designed streets create attractive public spaces with character, through their layout, landscape, including street trees, lighting, street furniture and materials.



Well-designed places have a hierarchy of well-connected routes, such as boulevards, streets, roads, avenues, mews and courts. New developments help to reinforce or extend the movement network. For pedestrians and cyclists, direct links create good connections to public transport and promote active travel, particularly where they are along routes with low levels of vehicular traffic.

M3 Well-considered parking, servicing and utilities infrastructure for all users

84 Parking standards are set locally and vary in response to local conditions. How parking is arranged has a fundamental effect on the quality of a place or development.

85 Well-designed car and cycle parking at home and at other destinations is conveniently sited so that it is well used. This could be off-street to avoid on-street problems such as pavement parking or congested streets. It is safe and meets the needs of different users including occupants, visitors and people with disabilities. It may be accommodated in a variety of ways, in terms of location, allocation and design.

86 Well-designed parking is attractive, well-landscaped and sensitively integrated into the built form so that it does not dominate the development or the street scene. It incorporates green infrastructure, including trees, to soften the visual impact of cars, help improve air quality and contribute to biodiversity. Its arrangement and positioning relative to buildings limit its impacts, whilst ensuring it is secure and overlooked.

87 Electric vehicle spaces and charging points need to be considered, so they are suitably located, sited and designed to avoid street clutter.

88 Access for servicing is also well-integrated into developments, including for refuse collection, deliveries and removals. Bin stores are carefully integrated so that bins are not visible from the street (see Homes and Buildings).

89 Utilities services and infrastructure include water supply, sewerage, drainage, gas, electricity, full fibre broadband, digital infrastructure and telephones. Their siting and layout take into account:

- their space requirements and visual impact;
- convenient maintenance while not impeding the planting of street trees; and
- implications for foreseeable future changes in demand.



*A guided busway with dedicated pedestrian and cycle paths provides fast and direct links to connect new and existing neighbourhoods with employment and services in **Cambridgeshire.***

Definitions

Movement network: The linked routes and connections for people and vehicles to go and move through places and spaces. Specific consideration is given to the needs of each of the different users of the network, including pedestrians, cyclists, public transport, cars and service vehicles.

Sustainable transport mode: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

Green corridor: Uninterrupted network of natural features within an urban area that acts as a linkage for wildlife, and potentially for people.

Street clutter: Street furniture and landscape arranged so that streets are difficult to move through, use or are unattractive.

Good practice examples

1 *A dedicated pedestrian and cycle Quietway route separates pedestrians and cyclists from vehicles in* ***Walthamstow, London.***

2 *Streets are places for people as well as cars.* ***Poundbury, Dorchester.***

3 *The street is designed with parking located in front of homes and screened with robust shrub planting and small trees. Planting is kept low to maintain visibility along the street and towards front doors.* ***Horsted Park, Kent.***







Looking forward

Have you considered:

- ☐ How to reduce reliance upon the private car? Moving away from car use for short journeys? Prioritising walking, cycling and public transport?
- ☐ How changing technology will continue to affect movement? Electric vehicles (cars and e-bikes) and their charging requirements? Private hire/driverless vehicles in terms of parking provision?
- ☐ How to improve air quality? Restrictions/ charging for certain types of vehicles? Natural features such as trees, hedges or water?

Nature

Enhanced and optimised



90 **Nature** contributes to the quality of a place, and to people's quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.

91 Well-designed places:

- integrate existing, and incorporate new natural features into a multifunctional network that supports quality of place, biodiversity and water management, and addresses climate change mitigation and resilience;
- prioritise nature so that diverse ecosystems can flourish to ensure a healthy natural environment that supports and enhances biodiversity;
- provide attractive open spaces in locations that are easy to access, with activities for all to enjoy, such as play, food production, recreation and sport, so as to encourage physical activity and promote health, well-being and social inclusion.

Informal doorstep play is located along a pedestrian route among planting and trees, well-overlooked by neighbouring homes. ***South Gardens, Elephant Park, London.***

N1 Provide high quality, green open spaces with a variety of landscapes and activities, including play

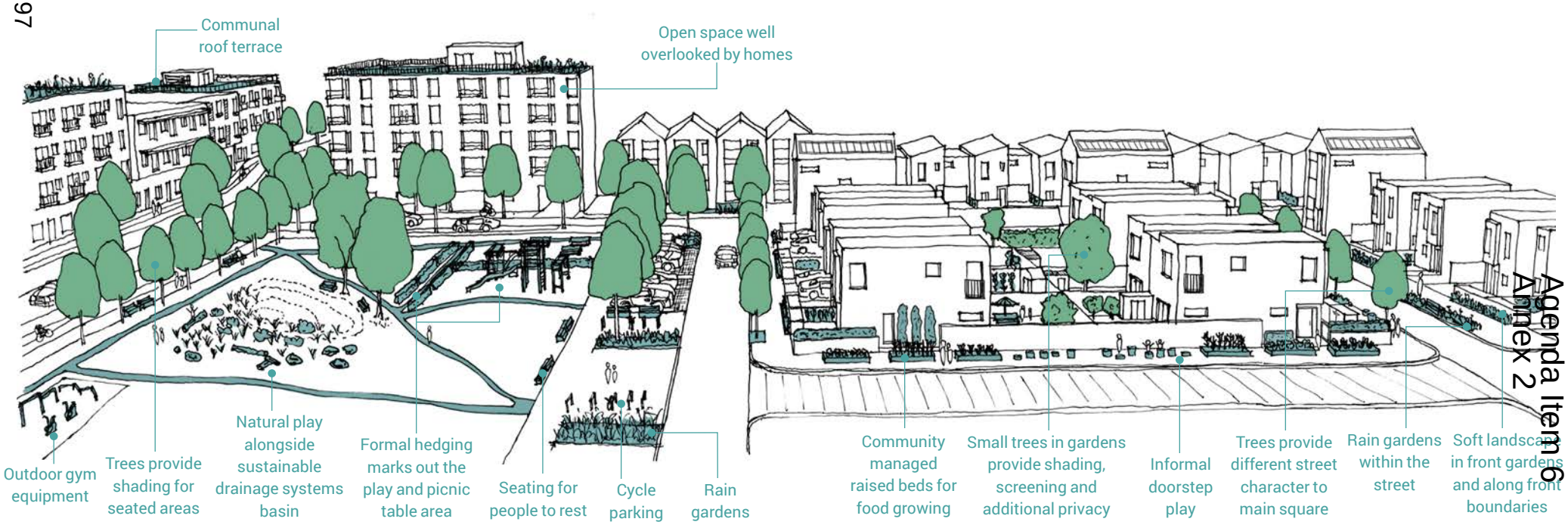
92 Well-designed places provide usable green spaces, taking into account:

- the wider and local context, including existing landscape and ecology;
- access;
- how spaces are connected;
- the balance between public and private open spaces – see Public spaces;
- their potential to contribute to a strategic green infrastructure system, and to water management – see below;
- their ability to support a range of activities and provide amenity value; and
- how they are to be managed and maintained.

93 Open spaces are designed to be high quality, robust and adaptable over time so that they remain fit for purpose and are managed and maintained for continual use.

94 Open spaces include public, shared and private outdoor spaces with:

- a range of sizes and locations;
- a variety of natural and designed landscapes for everyone, with different functions to suit a diverse range of needs;
- opportunities for formal and informal play, exercise and rest that are accessible to all and with no segregation;
- well-integrated drainage, ecology, shading, recreation and food production that achieve a biodiversity net gain as required by the 25-year Environment Plan; and
- well-considered maintenance and management regimes based on an understanding of the costs for occupants or users.



95 Public open spaces are open to all. They provide opportunities for comfort, relaxation, stimulation and social interaction in a safe environment. To encourage interaction in an open space, its location and structure need careful consideration along with its activities, versatility, and how it can be used and accessed by all groups of people.

N2 Improve and enhance water management

96 Water management maintains healthy water systems and is important for effective sustainable drainage systems. In well-designed places, water features form part of an integrated system of landscape, biodiversity and drainage. This includes new water features that manage drainage and also existing watercourses. Together with green and brown roofs, swales, rain gardens, rain capture and other drainage, water features create multifunctional 'green' sustainable drainage systems. They also enhance the attractiveness of open spaces and provide opportunities for play, interaction and relaxation.

97 Alternatively, places or developments may be designed to adapt to flood conditions. Examples may include a terraced open space where lower levels may become a water feature, or homes with habitable rooms lifted above flood level.



Introducing planting softens and greens the city centre and provides pocket parks, so enhancing the quality of the public realm. ***Grey to Green, Sheffield.***

N3 Support rich and varied biodiversity

98 Well-designed developments include site-specific enhancements to achieve biodiversity net gains at neighbourhood, street and household level. Green corridors can be used to extend and enhance existing ecosystems. Existing areas of valuable biodiversity are protected and enhanced. Priority is given to rare or critical habitats and species.

Definitions

Net gain for biodiversity: Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. See the Natural Environment planning practice guidance for more detail.

Green infrastructure: A network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Sustainable drainage systems: Features designed to reduce flood risk, which are built to receive surface water run-off, such as constructed wetlands, permeable surfaces, retention ponds, green roofs and swales.

Good practice examples

1 *Sustainable drainage systems and trees are incorporated into streets, creating a high quality, green setting for new homes and contributing to the character of the neighbourhood.* ***Upton, Northampton.***

2 *Ponds are used as a key part of the sustainable drainage systems strategy to manage drainage and provide an attractive rural outlook from neighbouring homes.* ***Houlton, Rugby.***

3 *New landscape in the courtyards of these existing homes promotes well-being and social interaction. It includes abundant planting with trees and wild flower meadows, new paths and seating, and carefully integrated parking.* ***Maritime Streets, Barrow-in-Furness, Cumbria.***







Looking forward

Have you considered:

- ☐ How to achieve a net gain in biodiversity?
- ☐ The impact of climate change on biodiversity?
- ☐ How natural features can contribute to quality, while addressing technical issues? Wetlands/ ponds?
- ☐ How natural features contribute to climate change mitigation or adaptation? Tree planting for CO_2 absorption and/ or shade?

Public spaces

Safe, social and inclusive



99 The quality of the spaces between buildings is as important as the buildings themselves. **Public spaces** are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements. These include areas allocated to different users – cars, cyclists and pedestrians – for different purposes such as movement or parking, hard and soft surfaces, street furniture, lighting, signage and public art.

100 Well-designed places:

- include well-located public spaces that support a wide variety of activities and encourage social interaction, to promote health, well-being, social and civic inclusion;
- have a hierarchy of spaces that range from large and strategic to small and local spaces, including parks, squares, greens and pocket parks;
- have public spaces that feel safe, secure and attractive for all to use; and
- have trees and other planting within public spaces for people to enjoy, whilst also providing shading, and air quality and climate change mitigation.

High quality public space at the heart of the city centre, designed as a flexible space with water features for play and animation. ***City Park, Bradford.***

P1 Create well-located, high quality and attractive public spaces

101 Well-designed public spaces, particularly streets, are designed to support an active life for everyone, and are maintained for continual use. It is important to design them to include all of the users who may wish to use them for activities such as socialising, informal doorstep play, resting and movement. Their success depends on them being fit for purpose, attractive places that people enjoy using.

102 In well-designed places, streets are public spaces that are open to all. They encourage people to walk and cycle rather than to depend upon cars, particularly for short, local journeys. They are accessible to all and designed to meet the needs of their most vulnerable users. They are places where the design of shared space schemes, that remove or reduce the distinction between the pavement and carriageway, takes into consideration the needs of people with disabilities particularly visual impairment.

103 High quality public spaces include natural elements such as tree planting or water. These may be sited within the space itself, associated with the buildings around its edges or in the backdrop of views (See **Nature**). The design of landscape influences the microclimate and can promote a sense of tranquillity.

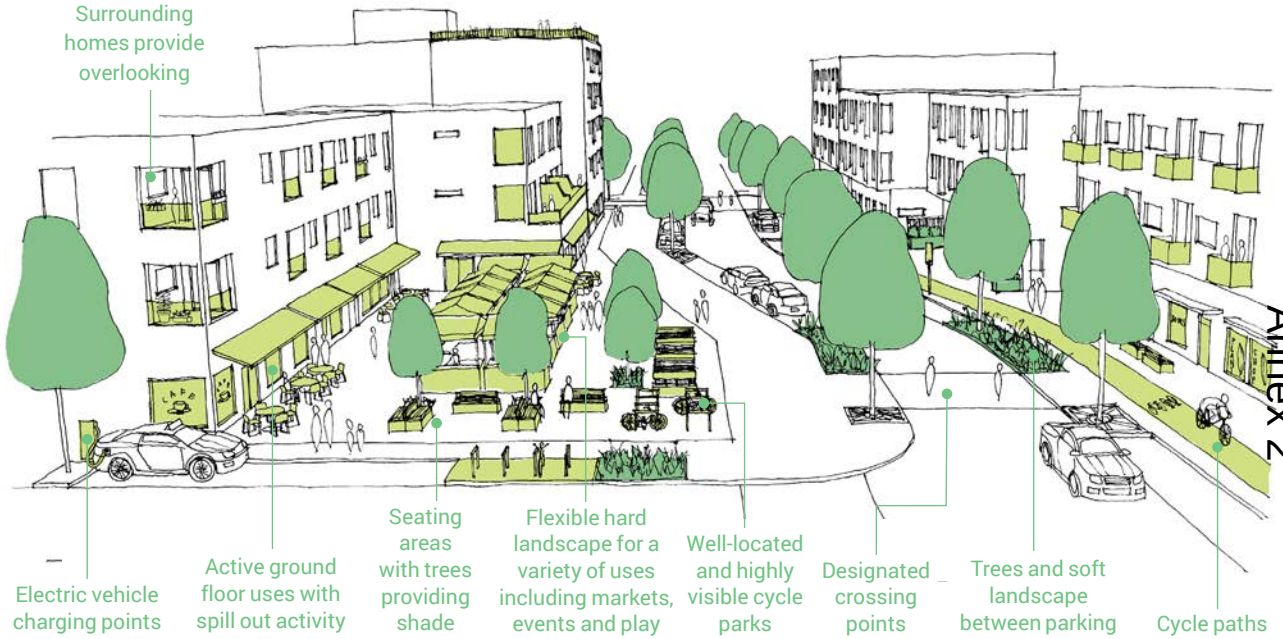
P2 Provide well-designed spaces that are safe

104 Well-designed public and shared amenity spaces feel safe for people who occupy the buildings around them, and also for visitors and passers-by. They help to overcome crime and the fear of crime.

105 Careful planning and design create the right conditions for people to feel safe and secure, without the need for additional security measures.



New public space that accommodates a range of activities, with a mix of uses around its edges, including a supermarket and housing. ***The Russells, Broadway, Worcestershire.***



These include:

- buildings around the edges of a space;
- active frontages along its edges, provided by entrances onto the space and windows overlooking it, so that people come and go at different times;
- natural surveillance from inside buildings provided by windows and balconies, so that users of the space feel they might be overlooked by people from inside;
- reasons for people to enter into the space, for an activity or destination or because it is on a natural line of direction of travel;
- risk assessment and mitigation at an early stage of the design process, so security measures can be integrated into positive design features.

P3 Make sure public spaces support social interaction

106 Well-designed public spaces are social spaces, providing opportunities for comfort, relaxation and stimulation for all, regardless of the type or tenure of the homes around them. They have widespread appeal, are able to accommodate people with different needs and can help combat social isolation and loneliness.



High quality green public spaces provide key pedestrian links to local facilities, a range of outdoor amenity including play areas, and a net gain in biodiversity. ***Beaulieu Park, Chelmsford.***

107 A well-designed public space that encourages social interaction is sited so that it is open and accessible to all local communities. It is connected into the movement network, preferably so that people naturally pass through it as they move around. It appeals to different groups. This is influenced by the range of activities that can happen within the space and who they are for. It is also influenced by the versatility and accessibility of its design. The uses around its edges reinforce its appeal and help make it into a destination.

Definitions

Active frontage: The front of a buildings with openings onto the space that generate activity and engagement between the building interior and the space outside, particularly entrances.

Natural surveillance: When buildings around a space are designed with features that are likely to lead to people overlooking the space. These may be windows, balconies, front gardens or entrances.

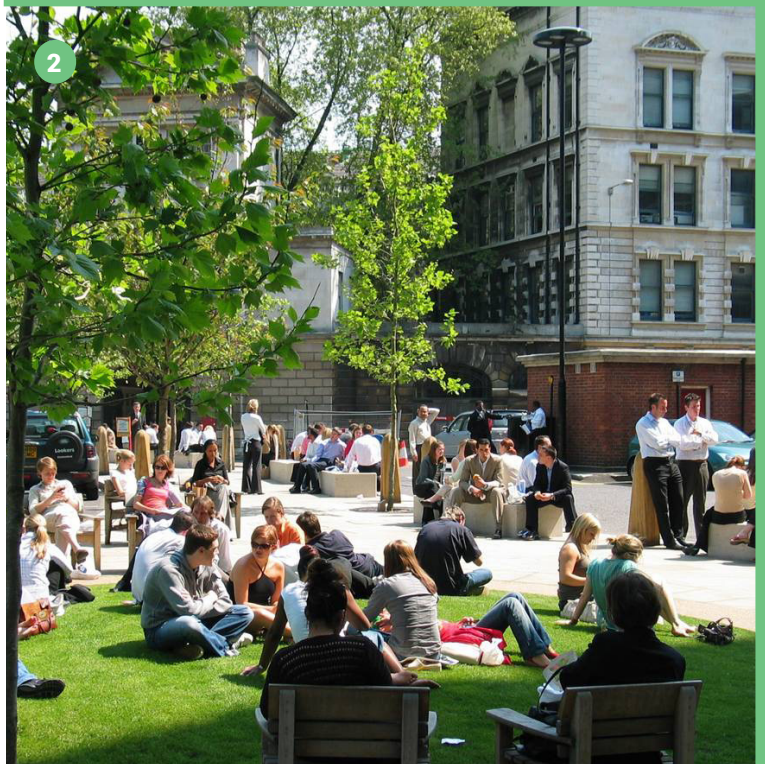
Good practice examples

1 *The street is designed to prioritise pedestrians with a focus on social interaction, such as play, communal gatherings and places to sit with neighbours.* ***Marmalade Lane, Cambridge.***

2 *Central urban public space with tree planting and grass provides a peaceful space to meet and interact in the city.* ***West Smithfield, The City of London.***

3 *Central pedestrianised street activated with cafés and shops spilling out, and strategically located trees, benches and bike stands to separate the external space of shop units from a central zone for movement.* ***Castle Street, Kingston upon Thames.***







Looking forward

Have you considered:

- ☐ How the design of public spaces can mitigate the 'heat island' effect? By planting trees? Introducing water into spaces?
- ☐ How to accommodate different users to prioritise walking and cycling? Using segregated spaces? Traffic calming measures?
- ☐ How public spaces meet the needs of the most vulnerable users – both young and old?

Uses

Mixed and integrated



108 Sustainable places include a mix of **uses** that support everyday activities, including to live, work and play.

109 Well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use.

110 Where there is rapid social and economic change, such as sustainable growth or diversification in rural communities or town centres, well-designed buildings and places are able to accommodate a variety of uses over time.

111 Well-designed places have:

- a mix of uses including local services and facilities to support daily life;
- an integrated mix of housing tenures and types to suit people at all stages of life; and
- well-integrated housing and other facilities that are designed to be tenure neutral and socially inclusive.

A high quality, mixed-use development with active frontages rejuvenates a town centre. ***Dickens Yard, Ealing, London.***

U1 A mix of uses

112 Successful communities require a range of local services and facilities including schools, nurseries, workplaces, healthcare, spiritual, recreational, civic and commercial uses. These:

- represent the needs and aspirations of the existing and future local community, including all ages and abilities;
- support everyday life and encourage sustainable lifestyles;
- are convenient and within walking or cycling distance on accessible routes to local homes and other facilities; and
- are located to complement rather than conflict with neighbouring uses in terms of noise, servicing and ventilation.

113 Mixed-use development creates an active and vibrant place that feels like a centre or destination. Typically, it is appropriate in urban locations and the centres of larger scale developments.

114 In well-designed mixed-use development, the interrelationship between different uses is designed to cater well for all users. Particular attention is paid to:

- the arrangement of ground floor uses, to ensure they are occupied successfully; and
- the access arrangements to upper floors, especially to homes.

U2 A mix of home tenures, types and sizes

115 Well-designed neighbourhoods provide a variety and choice of home to suit all needs and ages. This includes people who require affordable housing or other rental homes, families, extended families, older people, students, and people with physical disabilities or mental health needs.

116 Where different tenures are provided, they are well-integrated and designed to the same high quality to create tenure neutral homes and spaces, where no tenure is disadvantaged.

117 Well-designed places include a variety of homes to meet the needs of older people, including retirement villages, care homes, extra-care housing, sheltered housing, independent living and age-restricted general market housing. They are integrated into new settlements with good access to public transport and local facilities.

118 Well-designed larger scale developments include a range of tenures. They also promote a variety of development models, such as community-led development, self- and custom-build and build to rent. This supports a diversity of delivery, by small as well as large developers. It also helps to create rich, diverse settlements.

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Estate regeneration including new mixed tenure homes, a community centre and a Multi-Use Games Area for social and physical well-being. ***Bourne Estate, Holborn, London.***



A large mixed-use canal-side development with a range of mixed uses including commercial and residential around a central square. The square is designed to accommodate a variety of uses and events. It has many access points and is well-overlooked by neighbouring buildings. ***Brindleyplace, Birmingham.***

U3 Socially inclusive

119 Good design promotes social inclusion by:

- contributing to creating balanced and mixed neighbourhoods that are suitable and accessible for all;
- maximising the potential for social integration in the layout, form and appearance of types of development;
- avoiding features that could create actual or perceived barriers, or contribute to segregation, both within the development and with its surroundings;
- providing a consistent level of design quality across tenures, to support social integration; and
- using local resources such as schools, nurseries, community facilities, parks, other open spaces, health, and religious or cultural facilities in layouts to promote social interaction and integration, and help combat loneliness.



Multiple tenures including private ownership, rent, shared ownership and specialist housing groups, with no visual distinction in the facade or difference to communal entrances from the front. ***Buccleuch House, Clapton, London.***

Definitions

Tenure neutral: Housing where no group of residents is disadvantaged as a result of the tenure of their homes. There is no segregation or difference in quality between tenures by siting, accessibility, environmental conditions, external facade or materials. Homes of all tenures are represented in equally attractive and beneficial locations, and there is no differentiation in the positions of entrances. Shared open or play spaces are accessible to all residents around them, regardless of tenure.

Mixed-use development: Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or in close proximity within a particular area.

Good practice examples

1 *A village square is the focus of the community, faced by a mix of uses including a primary school with community centre, a nursery, shops, offices and flats and extra-care housing with a public cafe, shops, offices and flats. It creates a popular, flexible space for community activities.* ***Lightmoor, Telford.***

2 *A mix of house types and tenures for a range of housing needs are visually integrated, creating a mixed neighbourhood that faces onto a tree-lined avenue in a Conservation Area.* ***The Avenue, Saffron Walden.***

3 *A new church, cafe and community space is integrated in a new residential development.* ***Frampton Park Baptist Church, Hackney, London.***







Looking forward

Have you considered:

- ☐ How to introduce or promote a broad mix of uses to bring vibrancy to neighbourhood or other centres, including high streets?
- ☐ Will buildings be able to adapt to evolving uses, as changing technology affects patterns of work, shopping and leisure?
- ☐ How the use of community buildings and other facilities could be shared?
- ☐ How to make sure that developments are tenure neutral and do not disadvantage any group of residents?

Homes & buildings

Functional, healthy and sustainable



120 Well-designed **homes and buildings** are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them.

121 They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time.

122 Successful buildings also provide attractive, stimulating and positive places for all, whether for activity, interaction, retreat, or simply passing by.

123 Well-designed homes and buildings:

- provide good quality internal and external environments for their users, promoting health and well-being;
- relate positively to the private, shared and public spaces around them, contributing to social interaction and inclusion; and
- resolve the details of operation and servicing so that they are unobtrusive and well-integrated into their neighbourhoods.

A balcony has space for sitting and growing plants. It faces out to the public realm, but maintains a sense of enclosure and privacy. ***Prince Charles House, St Austell.***

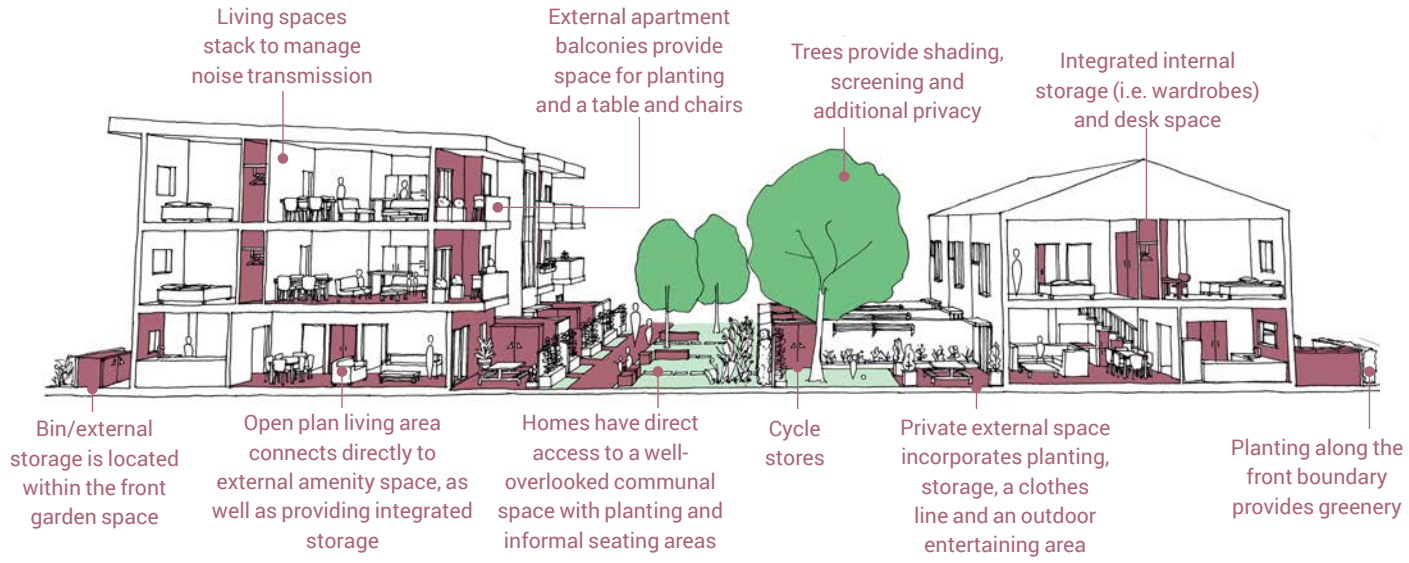
H1 Healthy, comfortable and safe internal and external environment

124 Good design promotes quality of life for the occupants and users of buildings. This includes function – buildings should be easy to use. It also includes comfort, safety, security, amenity, accessibility and adaptability.

125 Well designed homes and buildings are efficient and cost effective to run. They help to reduce greenhouse gas emissions by incorporating features that encourage sustainable lifestyles. They maximise natural ventilation, avoid overheating, minimise sound pollution and have good air quality.

126 Well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation. The quality of internal space needs careful consideration in higher-density developments, particularly for family accommodation, where access, privacy, daylight and external amenity space are also important.

127 Where a need is identified, Local Plans may adopt the Nationally Described Space Standards and those for accessibility and water.



128 Well-designed buildings have building safety requirements under other legislation in mind from the outset to provide a safe and secure environment for occupants and users. They allow ease of access for emergency services, and facilities for the safe access to and from buildings in the need for evacuation.

H2 Well-related to external amenity and public spaces

129 Well-designed buildings are carefully integrated with their surrounding external space. All private and shared external spaces including parking (see **Movement**), are high quality, convenient and function well. Amenity spaces have a reasonable degree of privacy External spaces are designed to respond to local character, as appropriate solutions will vary by the context, for example whether it is a town centre or suburb.

130 Well-designed private or shared external spaces are fit for purpose and incorporate planting wherever possible. The appropriate size, shape and position for an external amenity space can be defined by considering:

- how the associated building sits in the wider context, including access to public and open spaces;
- how the amenity space will be used, what for, and by whom;

- environmental factors that may affect its usability, such as sunlight and shade, noise or pollution;
- wider environmental factors affecting its quality or sustainability, such as a green corridor or drainage.

131 Well-designed shared amenity spaces feel safe and secure for their users. They are social spaces providing opportunities for comfort, relaxation and stimulation - including play - for residents, regardless of the type or tenure of homes. They are well-overlooked and all of the residents who share them can access them easily.

132 Private amenity spaces including balconies enhance visual and outdoor amenity. They can also provide a degree of privacy and separation for living areas from adjoining public space. Front gardens may incorporate planting to add to natural features within the public space.

133 Well-designed buildings relate well to the public spaces around them. The interface between building and public space is carefully designed so that it is positive and appropriate to its context (see also **Context**, **Identity** and **Public spaces**) and to the occupants and passers-by who use them.

H3 Attention to detail: storage, waste, servicing and utilities

134 Well-designed places include a clear attention to detail. This considers how buildings operate in practice and how people access and use them on a day-to-day basis, both now and in future. They include:

- Local waste storage, management and pick up: Refuse bins for all the different types of collection, including landfill, recycling and food waste. They are accessible and well-integrated into the design of streets, spaces and buildings, to minimise visual impact, unsightliness and avoid clutter. Where refuse bins are required to be on a street frontage or in a location that is visible from a street, they are sited within well-designed refuse stores that are easy for occupants to use.
- Services including utilities and window cleaning: Simple electric, lighting and water systems are discreet and well-designed. They are easy to access, clean and maintain.
- Exterior details: Drainpipes, gutters and meter boxes are integrated into the wider design to avoid a cluttered appearance.
- Cycle storage: Conveniently positioned and sensitively integrated into public spaces, amenity space or buildings.



Well-designed and naturally lit internal spaces with views out. ***Hortsley, Seaford.***

Definitions

Amenity space: The outside space associated with a home or homes. It may be private or shared, depending on the building it serves.

Good practice examples

1 *House frontages are carefully designed with generous windows from habitable rooms, visible and attractive front doors and planting to act as buffer between the pavement and window.* ***Caudale, Camden, London.***

2 *Affordable housing with simple design is well-integrated into a mixed tenure development.* ***Derwenthorpe, York.***

3 *Internal habitable rooms have high levels of natural daylight and connect well to gardens and terraces.* ***Accordia, Cambridge.***







Looking forward

Have you considered:

- ☐ How the design and development of homes addresses different lifestyles, abilities and stages of life, including an ageing population?
- ☐ How it enables a variety of different development models? Community-led development? Cohousing?
- ☐ How the design of homes is adaptable to meet the future needs of residents? Whole life approaches?

Resources

Efficient and resilient



Low energy housing with passive solar design, including shading to prevent overheating in summer, and highly insulated thermal mass construction. ***Great Bow Yard, Langport, Somerset***

135 Well-designed places and buildings conserve natural **resources** including land, water, energy and materials. Their design responds to the impacts of climate change. It identifies measures to achieve:

- mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and
- adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.

136 A compact and walkable neighbourhood with a mix of uses and facilities reduces demand for energy and supports health and well-being. It uses land efficiently so helps adaptation by increasing the ability for CO_2 absorption, sustaining natural ecosystems, minimising flood risk and the potential impact of flooding, and reducing overheating and air pollution.

137 Well-designed places:

- have a layout, form and mix of uses that reduces their resource requirement, including for land, energy and water;
- are fit for purpose and adaptable over time, reducing the need for redevelopment and unnecessary waste;
- use materials and adopt technologies to minimise their environmental impact.

R1 Follow the energy hierarchy

138 Well-designed places and buildings follow the energy hierarchy, starting with:

- reducing the need for energy;
- energy efficiency (see below);
- maximising the potential for energy supply from decentralised, low carbon and renewable energy sources, including community-led initiatives; and then
- efficiently using fossil fuels from clean technologies.

139 They maximise the contributions of natural resources such as sun, ground and wind, and include passive measures for light, temperature, ventilation and heat.

140 They make use of renewable energy infrastructures, such as photovoltaic arrays, ground source heat pumps and district heating systems, to reduce demand for non-sustainable energy sources. IT advances and app-based solutions allow users of well-designed places and homes to take ownership or management of these systems in order to use them most efficiently.

141 Good developments minimise the cost of running buildings and are easy and affordable for occupants to use and manage.

R2 Selection of materials and construction techniques

142 The selection of materials and the type of construction influence how energy efficient a building or place can be and how much embodied carbon it contains.

143 Well-designed proposals for new development use materials carefully to reduce their environmental impact. This may be achieved in many different ways, for instance through materials that are locally sourced, high thermal or solar performance; or designs based on the typical dimensions of materials to reduce waste.

144 A well-designed place is durable and adaptable, so that it works well over time and reduces long-term resource needs. The re-use and adaptation of existing buildings reduces the consumption of resources and contributes to local character and context.

145 New construction techniques may contribute towards improving efficiency, productivity and the quality of new homes and buildings. These include the off-site manufacture of buildings and components using innovative and smart technologies, supported by digital infrastructure. They offer the potential to reduce whole life costs and for users to customise the products. Careful consideration needs to be given to placemaking, local distinctiveness and the character of new homes and buildings.



A community self-build project with a range of house types and a commitment by residents to support and live to environmental values. ***Ashley Vale, Self-build, Bristol.***

R3 Maximise resilience

146 Well-designed places are robust and take account of local environmental conditions, both prevailing and forecast. They contribute to community resilience and climate adaptation by addressing the potential effects of temperature extremes in summer and winter, increased flood risk, and more intense weather events such as rainstorms.

147 Well-designed buildings make the most of passive design strategies to minimise overheating and achieve internal comfort. These include:

- the layout and aspect of internal spaces;
- insulation of the external envelope and thermal mass;
- management of solar gain; and
- natural ventilation.

They may be supported by other measures where necessary.

148 Well-designed public and open spaces incorporate planting, structures and water for comfort. They create shade and shelter for their users, improve air quality and mitigate the effects of pollution. Deciduous trees provide shade to buildings, helping to manage solar gain when needed in summer months. These landscape features also contribute to reducing the 'heat island' effect whereby the temperatures in built up areas are significantly higher than outside them.



An old chocolate factory has been converted to apartments with new housing alongside the original buildings. This compact development is located close to a train station and local facilities. ***The Chocolate Quarter, Keynsham***

149 Well-designed places have sustainable drainage systems to manage surface water, flood risk and significant changes in rainfall. Urban environments make use of 'green' sustainable drainage systems and natural flood resilience wherever possible (see Nature). Homes and buildings also incorporate flood resistance and resilience measures where necessary and conserve water by harnessing rainfall or grey water for re-use on-site.

Definitions

Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Climate change adaptation: Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Good practice examples

1 *A communal winter garden, events space and artist's residence were created from two derelict terraced houses for the benefit of the local community.* ***Granby Winter Garden, Liverpool.***

2 *A social housing development that sits well in the local urban context and meets high environmental standards.* ***Goldsmith Street, Norwich.***

3 *Modular homes improve quality through factory production and minimise on-site construction time.* ***New Islington, Manchester.***







Looking forward

Have you considered:

- ☐ How the design of developments can mitigate or adapt to extreme weather events?
- ☐ How changing energy technologies, including electrical storage, will influence places?
- ☐ How design, procurement and construction can take up new opportunities and future trends to minimise the use of resources? For example, in digital, construction and energy technologies and infrastructure?

Lifespan

Made to last



150 Well-designed places sustain their beauty over the long term. They add to the quality of life of their users and as a result, people are more likely to care for them over their **lifespan**. They have an emphasis on quality and simplicity.

151 Well-designed places, buildings and spaces are:

- designed and planned for long-term stewardship by landowners, communities and local authorities from the earliest stages;
- robust, easy to use and look after, and enable their users to establish a sense of ownership and belonging, ensuring places and buildings age gracefully;
- adaptable to their users' changing needs and evolving technologies; and
- well-managed and maintained by their users, owners, landlords and public agencies.

Garden City principles include community ownership of land, long-term stewardship of assets and community engagement in management.
Letchworth Garden City, Hertfordshire.

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L1 Well-managed and maintained

152 Good management contributes to the resilience, attractiveness and beauty of a place. Well-designed places are robust, durable and easy to look after. They are designed so management and maintenance responsibilities are clearly defined for all parts of a development.

153 Well-designed places consider management and maintenance regimes from the early stages of the design process. They take into account potential impacts on communities such as in the form of service charges or where management will pass into their control. Management of local waste, cleaning, parking, internal common spaces, shared spaces and public spaces are all considered from the outset. These include play areas, open spaces, streets and other public spaces.

154 Community management systems are designed in from the start, with users and stakeholders involved during the design process, so that they are fit for purpose.

155 High density urban developments, including tall buildings also consider long-term management requirements, such as for the renewal of cladding systems.

L2 Adaptable to changing needs and evolving technologies

156 While public places are inclusive to all, well-designed private places, such as homes and gardens, are designed to be flexible to adapt to the changing needs of their users over time. This includes changes in the health and mobility of the user, as well as potential changes in lifestyle due to developing technologies, such as use of electric vehicles, remote working and general changes to the way in which people live.

157 Well-designed places also have high-speed digital connectivity in order to provide options and information for education, health, leisure, social interaction, businesses and home working.



*Affordable housing for local people developed by a Community Land Trust in **Brambleside, St Teath.***



*A cohousing scheme built around a large communal courtyard provides an alternative, community-focused housing option, where residents were involved in the design process throughout. **New Ground Cohousing, Barnet, London.***

L3 A sense of ownership

158 Well-designed places clearly define the boundaries for private, shared and public spaces, making it more likely that occupants will use, value and take ownership of them.

159 They include features that encourage users to really care for them. For example, well-sized apartment balconies with enough space for people to enjoy sitting out and personalising them with a degree of privacy. Shared spaces are visible and easy to get to, so they feel accessible to their intended users. They are also flexible so can be used for a variety of activities.

160 Community management and maintenance of shared amenities - such as halls and gardens - is more likely to be a success when the future community is involved in the design process from the start.



A communal terrace is provided for all residents to enjoy in this community-led estate regeneration scheme. ***Marklake Court, Southwark, London.***

Definitions

Community management: The communal management of a shared resource or facility by an organisation controlled by the community who it benefits.

Good practice examples

1 *A corner house with an annexe provides options for multi-generation living. It is a positive response to a corner site in a terraced housing layout.* ***Chobham Manor, Stratford, London.***

2 *A communal green, overlooked by neighbouring homes, is a place for the local community to come together.* ***The Triangle, Swindon.***

3 *A large site has been allocated for self- and custom-build, with affordable plots providing new options for housing delivery, as well as affordable homes and some apartments for sale . This embeds homeowners into the design process from the start and ensures the homes are fit for their needs.* ***Graven Hill, Bicester.***







Looking forward

Have you considered:

- ☐ How management and stewardship may evolve with digital technologies and management systems?
- ☐ How new and flexible working practices may affect places?
- ☐ How changing home ownership and rental patterns will affect places?
- ☐ How changing construction technologies will influence management and maintenance?

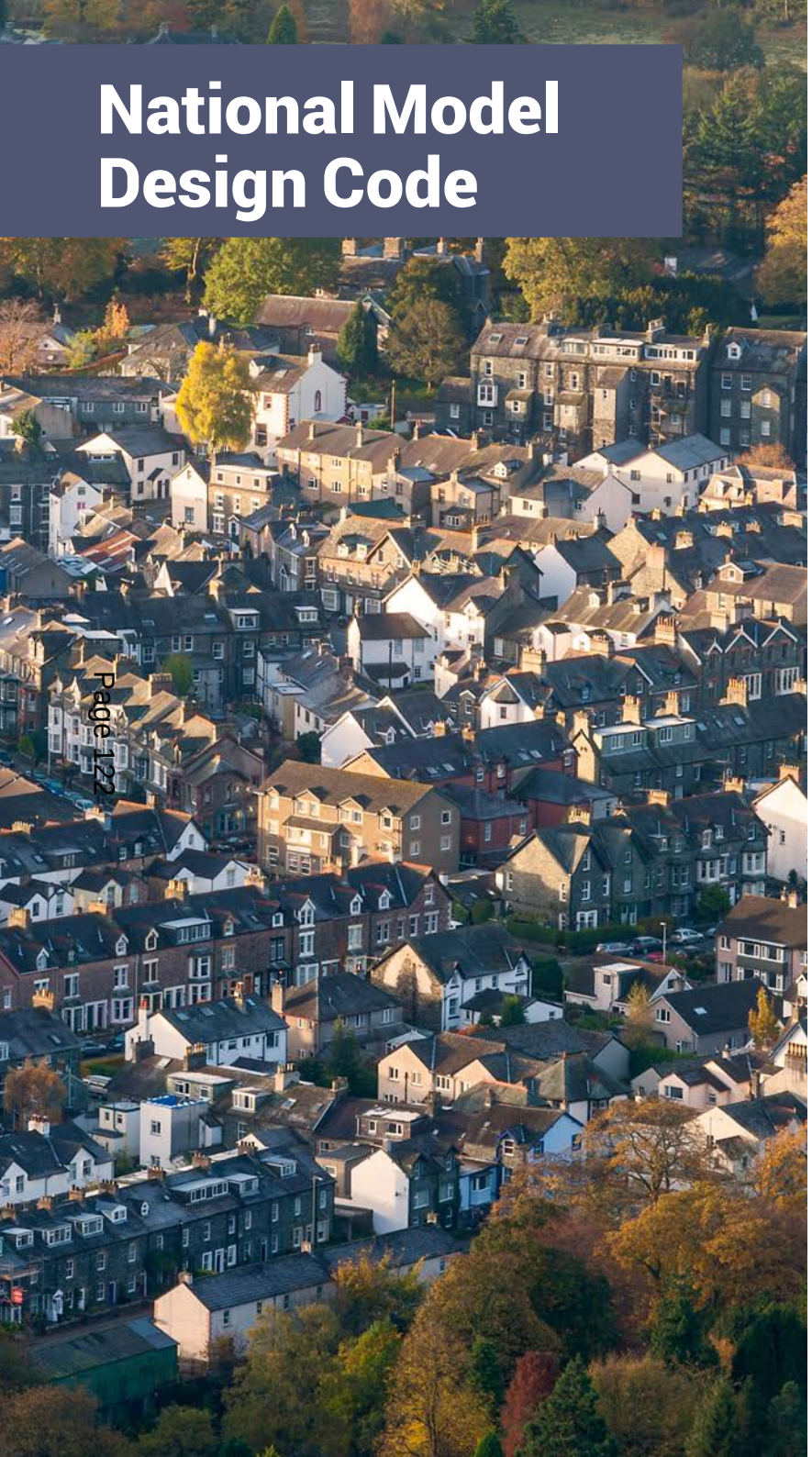
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Part 3:

National Model Design Code



National Model Design Code



161 A National Model Design Code, will be published setting out detailed standards for key elements of successful design.

162 This will be subject to consultation and consider the findings of the Building Better, Building Beautiful Commission who are due to publish their final report in December 2019, including recommendations to the Government on how to promote and increase the use of high-quality design for new build homes and neighbourhoods.

163 The National Model Design Code will set a baseline standard of quality and practice across England which local planning authorities will be expected to take into account when developing local design codes and guides and when determining planning applications.

164 This could include:

- the factors to be considered when determining whether façades of buildings are of sufficiently high quality;
- how landscaping should be approached (including the importance of streets being tree-lined wherever possible);
- that new developments should utilise a pattern of clear front and backs; and
- that developments should clearly take account of local vernacular, architecture and materials.

165 The Government understands that quality design does not look the same across different areas of the country, for instance, that by definition local vernacular differs.

166 It is for this reason, that local planning authorities will be expected to develop their own design codes or guides, taking in to consideration the National Model Design Code. These will set out clear parameters for what good quality design looks like in their area, following appropriate local consultation.

167 Paragraph 130 of the National Planning Policy Framework states clearly that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides.

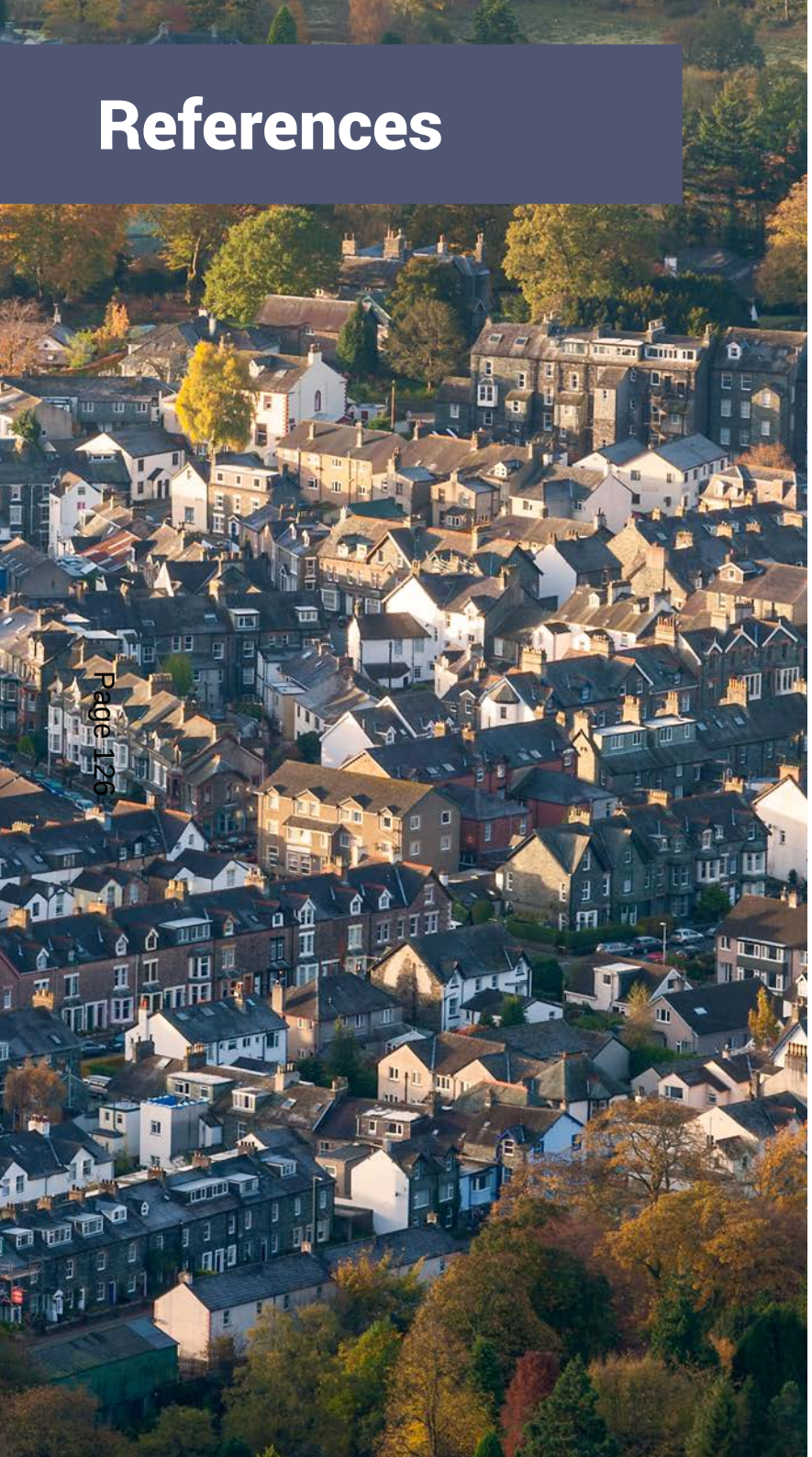
168 In the absence of local design guidance, local planning authorities will be expected to defer to the illustrated National Design Guide and National Model Design Code. This will be consulted on, alongside the consultation on the use of the National Model Design Code, in early 2020.

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Part 4:
References



References



169 The ten characteristics in this National Design Guide are based on the objectives for design set out in Chapter 12: Achieving well-designed places of the National Planning Policy Framework.

170 There are many other guides to good design and placemaking. They provide more detailed guidance and examples of best practice on particular topics to inform local authority officers and councillors, applicants and their design teams, and also local communities.

171 The following is a list of key references that provide further information to the guidance set out within the National Design Guide.

172 Part 4 also provides details for the good practice examples that illustrate the ten characteristics, and image credits, in Table 1.

173 Other chapters of the National Planning Policy Framework and the planning practice guidance provide more detail on the Government's policy in relation to some of the ten characteristics, as set out in Tables 2 and 3.

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Agenda Item 6
Annex 2

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Table 1: Good practice examples and image credits

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p.13, image 2	The Piggeries, Frome, Somerset	Guinness Trust	APG Architecture	Mendip District Council	© Liz Kessler
p. 13, image 3	Timekeepers Square, Salford	The English Cities Fund	Buttress Architects / Hyland Edgar Driver	Salford City Council	© Daniel Hopkinson/Buttress Architects
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p. 21, image 2	Officers Field, Weymouth	ZeroC Developments	HTA Design LLP	Weymouth and Portland Borough Council	© HTA Design LLP
p.21, image 3	St Andrews Block B, Bromley by Bow, London	Barratt and Circle Anglia	Maccreanor Lavington with Allies and Morrison and Glenn Howells Architects / Townshend Landscape Architects	Tower Hamlets Council	© Tim Crocker

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Table 2: National Planning Policy Framework chapters and planning practice guidance relevant to the National Planning Policy Framework objectives for good design

National Planning Policy Framework objective for good design	*National Planning Policy Framework chapter*	*Planning practice guidance*
Promote safety and security	8 Promoting healthy and safe communities 12 Achieving well-designed places	Healthy and safe communities
Health and well-being	8 Promoting healthy and safe communities 12 Achieving well-designed places	Healthy and safe communities
Inclusion	5 Delivering a sufficient supply of homes 8 Promoting healthy and safe communities 12 Achieving well-designed places	Housing for older and disabled people Healthy and safe communities
Address the needs of an ageing population	5 Delivering a sufficient supply of homes 8 Promoting healthy and safe communities	Housing for older and disabled people Healthy and safe communities
Community cohesion and resilience	8 Promoting healthy and safe communities 12 Achieving well-designed places	Healthy and safe communities
Creating mixed and balanced communities	5 Delivering a sufficient supply of homes	Housing needs of different groups
Help to make development acceptable to communities	12 Achieving well-designed places	Design
Visually attractive	12 Achieving well-designed places	Design
Sympathetic to local character/ local history	12 Achieving well-designed places 16 Conserving and enhancing the historic environment	Historic environment Light pollution Noise
Accessible	6 Building a strong, competitive economy 8 Promoting healthy and safe communities 9 Promoting sustainable transport 12 Achieving well-designed places	Sustainable transport and accessibility Healthy and safe communities
With a high standard of amenity	12 Achieving well-designed places	Open space, sports and recreation facilities, public rights of way and local green space Advertisements Historic environment Natural environment

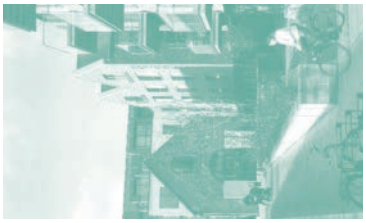
National Planning Policy Framework objective for good design	*National Planning Policy Framework chapter*	*Planning practice guidance*
Well-functioning	12 Achieving well-designed places	Design
Supported by local facilities and transport networks	5 Delivering a sufficient supply of homes 8 Promoting healthy and safe communities 9 Promoting sustainable transport 12 Achieving well-designed places 15 Conserving and enhancing the natural environment.	Sustainable transport and accessibility
Last a lifetime	9 Promoting sustainable transport 12 Achieving well-designed places 14 Meeting the challenge of climate change, flooding and coastal change	Climate change Flood risk and coastal change Design Sustainable transport and accessibility
Optimise the potential of a site	11 Making effective use of land 12 Achieving well-designed places	Effective use of land
Addressing climate change, including resource and energy efficiency and risk of flooding	14 Meeting the challenge of climate change, flooding and coastal change	Renewable and low carbon energy Climate change Water supply, waste water and water quality Flood risk and coastal change
Promoting sustainable transport	9 Promoting sustainable transport	Sustainable transport and accessibility Air quality
Responding to technological change	9 Promoting sustainable transport 14 Meeting the challenge of climate change, flooding and coastal change	Sustainable transport and accessibility Climate change Renewable and low carbon energy

Table 3: National Planning Policy Framework chapters and planning practice guidance relevant to the ten characteristics

Characteristic	*National Planning Policy Framework chapter*	*Planning practice guidance*
Context	8 Promoting healthy and safe communities 12 Achieving well-designed places 14 Meeting the challenge of climate change, flooding and coastal change 15 Conserving and enhancing the natural environment 16 Conserving and enhancing the historic environment	Design Historic environment Natural environment Healthy and safe communities Flood risk and coastal change Climate change
Identity	8 Promoting healthy and safe communities 12 Achieving well-designed places 15 Conserving and enhancing the natural environment 16 Conserving and enhancing the historic environment	Design Healthy and safe communities Natural environment Historic environment
Built form	8 Promoting healthy and safe communities 9 Promoting sustainable transport 11 Making effective use of land 12 Achieving well-designed places	Design Healthy and safe communities Sustainable transport and accessibility Effective use of land
Movement	8 Promoting healthy and safe communities 9 Promoting sustainable transport 12 Achieving well-designed places	Design Healthy and safe communities Sustainable transport and accessibility Open space, sports and recreations facilities, public rights of way and local green space
Nature	8 Promoting healthy and safe communities 12 Achieving well-designed places 14 Meeting the challenge of climate change, flooding and coastal change 15 Conserving and enhancing the natural environment	Design Healthy and safe communities Climate change Natural environment Flood risk and coastal change Open space, sports and recreations facilities, public rights of way and local green space

Characteristic	*National Planning Policy Framework chapter*	*Planning practice guidance*
Public spaces	8 Promoting healthy and safe communities 9 Promoting sustainable transport 12 Achieving well-designed places	Design Healthy and safe communities Sustainable transport and accessibility Open space, sports and recreations facilities, public rights of way and local green space
Uses	2 Achieving sustainable development 5 Delivering a sufficient supply of homes 6 Building a strong, competitive economy 7 Ensuring the vitality of town centres 8 Promoting healthy and safe communities 12 Achieving well-designed places	Design Housing for older and disable people Healthy and safe communities Town centres and retail Effective use of land
Homes & buildings	8 Promoting healthy and safe communities 12 Achieving well-designed places	Design Healthy and safe communities Effective use of land Housing for older and disabled people Noise
Resources	12 Achieving well-designed places 14 Meeting the challenge of climate change, flooding and coastal change	Design Climate change Flood risk and coastal change Renewable and low carbon energy
Lifespan	10 Supporting high quality communications 12 Achieving well-designed places	Design Renewable and low carbon energy












Councillor's Companion

for Design in Planning



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Foreword

The Councillor's Companion will help elected members ensure that our neighbourhoods are well designed; providing much-needed homes with good access to local services and amenities – creating successful places where we all want to live and enjoy.

We explain how Councillors can make a positive difference through the planning process; ensuring well-designed places where walking, cycling and social exchange achieve a happier, healthier quality of life, with easily accessible economic and leisure activities.

Whether you are involved at cabinet level, on a planning committee, or have oversight of your ward and its development, you can make a difference. Getting involved in plan-making and reading your local design guidance is a vital element of your role in representing the needs and aspirations of your neighbourhood.

You can also ensure that your planning service is well resourced, that it has high-quality, trained planning and urban design professionals, and seek independent expert design advice from a design review panel when it is needed.

Left – Townhouses and practical, overlooked public space at Timekeepers Square, Salford

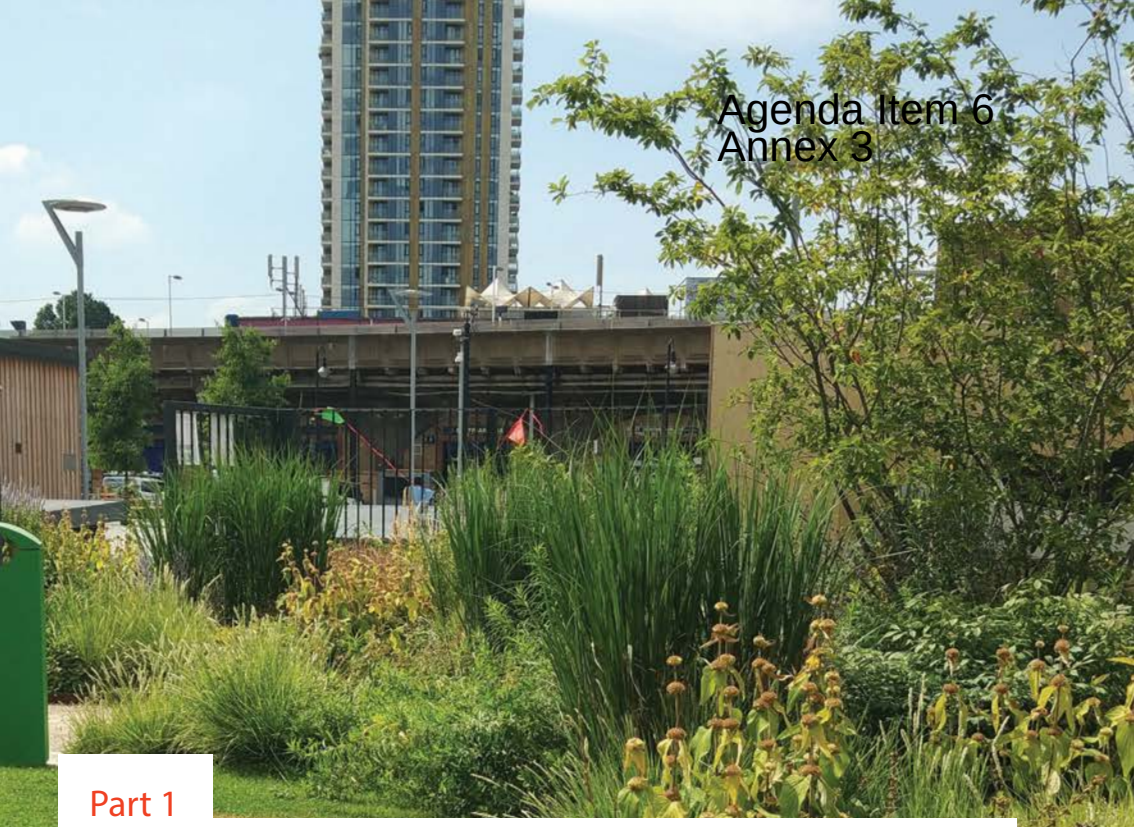
Below – Well-designed homes on this residential street incorporating front gardens, street trees and parking at Edgware Green, Harrow

Understanding the ingredients of successful places will help deliver popular and effective plans. The three most important characteristics of successful development are durability, fitness for purpose and beauty.

This Companion sets out the key characteristics of well-designed places and explains how to make informed decisions about the physical form of buildings and use of development, in the light of policy aimed at balancing public benefits.

By sharing experience in understanding what works well where, we can create lasting legacies in our neighbourhoods.





Part 1

Why do planning and design fit together?

In the context of planning, design is the process of working out the shape or form of a development. The planning system in the UK is concerned with:

- Land use: deciding which uses should go where, the relationships between these uses, and ensuring that they are fit for purpose.
- The physical form of development is defined by: its layout, height, massing and appearance. These play an important role in making a successful place that is easy to navigate, accessible and adaptable.

National planning policy is set out in the National Planning Policy Framework (NPPF). The NPPF is non-statutory guidance but is an important material consideration in local planning authorities' decision making. It is supported by online guidance from the National Planning Practice Guidance (NPPG).

NPPF Paragraph 8 explains that the planning system has three overarching objectives:

1. Economic: to help build a strong, responsive and competitive economy
2. Social: to support strong, vibrant and healthy communities
3. Environmental: to contribute to protecting and enhancing the natural, built and historic environment

Left – New public space encouraging wildlife, spaces for play and social exchange at St Mary's Churchyard Park at Elephant and Castle, London

From this framework of national policy, local planning authorities produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. Other statutory documents will be produced locally, such as Conservation Area Statements or Supplementary Planning Documents (SPDs) which contain greater detail on specific areas or design principles to guide change.

All these plans and documents must be in general conformity with the NPPF. The following paragraphs from the NPPF set out overarching planning policies.

NPPF Paragraph 7 states that:
'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level the objectives of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.'

Paragraph 124 explains that:
'Good design is a key aspect of sustainable development'… and *'the creation of high quality buildings and places is fundamental to what the planning and development process should achieve.'*

Places have to work hard, accommodating different activities by different users at different times of the day. This can bring about conflict and planning seeks to balance varying requirements. The physical form of places, their layout and where different uses go, can help optimise the areas' usefulness for different people and minimise the potential problems each activity can cause for others. For example, careful design of restaurant extraction equipment beneath homes can avoid noise and odours, and raised crossing treatments on key pedestrian routes can help promote safety and accessibility.

Here are some ways you can help influence and manage the way places change so they improve and provide for the community:

- Get involved in plan-making
- Understand your design policies
- Ensure that your planning service is well-resourced; and that is has high-quality, trained urban design professionals
- Have access to independent expert design advice from a local design review panel when needed
- Get to know your area well and what is needed to improve it
- Understand what makes a successful place
- Attend as many training sessions as you can to learn about design and the built environment

Achieving policy objectives

Political objectives vary with changes in government, public opinion and circumstance. In the work of regional, city or local government administrations they can include the following priorities:

- Improving public health and wellbeing
- Stimulating and sustaining economic growth
- Promoting resource efficiency, including reducing carbon emissions
- Social inclusion and the creation of a fair society
- Building housing and increasing public appetite for development

Achieving these objectives requires many types of action and intervention. Planning can contribute to all of them, so it is appropriate that the planning system operates through the political system. Elected politicians from Secretaries of State to Parish Councillors are directly involved in making local and neighbourhood plans, taking planning decisions and representing their communities.

These political objectives can be met at a variety of scales. Whether they are being applied to the design of a house extension, a neighbourhood, village, town or city, the focus must be on creating development that will work well for its purpose and mature successfully.

NPPF Paragraph 91 states that:
'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
Promote social interaction…
Are safe and accessible…
Enable and support healthy lifestyles…'

It goes on to say that wellbeing needs to include: *'The provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*



Right – An accessible park and outdoor gym enjoyed by all ages

Chapter 5 of the NPPF refers to the need to deliver a sufficient supply of homes.

NPPF Paragraph 59 states that:
'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount of variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.'

The NPPF sets out in Chapter 6 its objective to build a strong, competitive economy.

NPPF Paragraph 80 states that:
'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.'

Planning for good design can help achieve these objectives by:

- Setting out clearly in local plans the aims and ambitions of local people and their needs
- Involving local people to engage with the plan-making process
- Ensuring that what is built is of high quality

The plan-making process should help identify a sufficient amount and variety of land, appropriately located to provide homes for specific needs.

Evidence-based local plans will set out the detail, identifying the size, type and tenure of homes.

The aim is to create mixed and balanced communities supporting social inclusion.

Other policy objectives will relate to the planning and design of accessible neighbourhood amenities such as public open space, walking and cycling routes, schools, medical and community facilities and leisure activities.

NPPF Paragraph 11 explains that:
'Plans and decisions should apply a presumption in favour of sustainable development.' This means that planning authorities 'should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.'

As Local Councillors we are well placed to see and drive these changes.

Making good decisions

With a presumption in favour of development, it is important to understand what are legitimate planning concerns, and what are not; this will aid discussions with your constituents and decision making at planning committees.

Although residents may have concerns regarding many aspects of change in their area, some of these might not be relevant when negotiating or deciding on a planning application. For example, people might be worried about construction traffic and noise. But this is not a valid reason to amend or refuse a planning application (although you, and they, might like to scrutinise and request changes to any construction noise and vibration management plan that is required).

Similarly, it will be helpful to explain to residents that national planning policies set a presumption in favour of development: a positive approach to change. Change may be inevitable, so you may like to steer residents to legitimate planning issues, as expressed in planning policies, and help them think through how they feel proposals relate to these. The design issues covered in this Companion are all legitimate planning issues, so people who focus on these will have more opportunity to influence how their area changes.

A planning application should be decided in line with policies in the local development plans, unless the council decides that some other material planning consideration justifies making a decision contrary to those policies. Local development plans include the council's own local plan as well as neighbourhood plans and those made on a wider basis such as plans made by National Park authorities, the London Plan and city-region plans produced by combined authorities. For this document, we will just refer to 'local plans'.

NPPF Paragraph 38 states that:
'Local planning authorities should approach decisions on proposed developments in a positive and creative way. They should use the full range of planning tools available... and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.'

Right – Site visits: watch how people use and move around an area

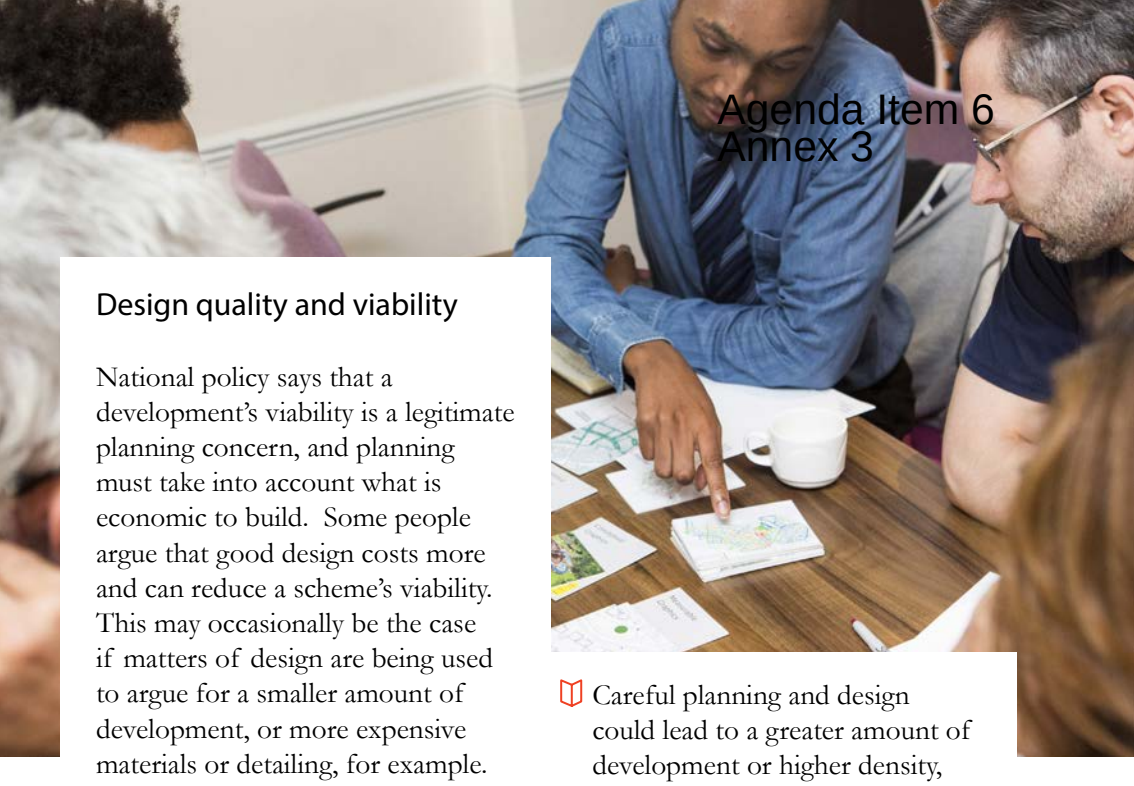
Each local authority has an adopted code of conduct that sets out rules governing the decision-making role of Councillors. This local code recognises your role as someone who has a significant influence in built-environment decision making, a 'Place-Shaper'. It will guide you in taking part in pre-application discussions on behalf of your community, and engaging in spatial planning for the whole authority.

In your decision-making role on a planning committee you judge the needs of the present generation and ensure the requirements of future generations are taken into account by determining if the application before you meets, on balance, policy requirements.



To help you do this:

- **Meet and listen** to the views of interested parties. Keep an open mind until all views, including those put forward at a planning meeting, have been aired
- **Learn how to speed-read** so that you can read every planning report, including the legal documentation
- **Make clear your concerns**, and those of your community, being mindful not to predetermine an application
- **Do not say, write or do anything** that would make it appear that you have already decided how you are going to vote prior to hearing the case at planning committee
- **If you object to a proposal, represent your community** by speaking at the planning committee meeting, setting out clearly where, and why, you consider the application departs from policy
- **Be prepared to attend an appeal hearing** if the application is refused to submit your planning arguments and evidence to the Planning Inspectorate



Design quality and viability

National policy says that a development's viability is a legitimate planning concern, and planning must take into account what is economic to build. Some people argue that good design costs more and can reduce a scheme's viability. This may occasionally be the case if matters of design are being used to argue for a smaller amount of development, or more expensive materials or detailing, for example. However, in most cases good design does not cost more. Good designers will be open to the challenge of working within a budget and viability should never be an excuse for poor design.

Bear in mind that a well-designed building or place maintains long-term value, contributes to the health and well-being of society and can be a welcomed neighbour to an existing community. Consider the following:

- Materials, landscaping and details will have some effect on building costs and viability. Such costs are likely to be small compared to the costs of land acquisition and general construction. A scheme that relies on low-quality materials and skimp on landscaping to be viable, is unlikely age well, be easy to be manage and maintain, or contribute positively to the neighbourhood

- Careful planning and design could lead to a greater amount of development or higher density, to make best use of the site without detracting from the area's attractive character

- Planning and designing in response to the character of a place may involve optimising height, bulk and plot coverage to ensure that new development is in keeping with its context, and makes a positive contribution to that character

- Exploring alternative building layouts, orientation, shapes and uses for the site, perhaps using design review, may create a scheme that not only fits in better, but allows more development than one that uses standard building types or layouts

Left – Workshops are a useful way of engaging communities and stakeholders

Below – Planning is creative; explore alternative building layouts, orientation, shapes and uses

Making a significant improvement to a place can be hard to achieve within a narrowly drawn site boundary. The answer may be to consider how best to negotiate, approve and deliver benefits from the development beyond the site. This could be in terms of public space, local amenities, and better walking and cycling opportunities. These will all contribute to long-term improvements in health as well as well-being.

However, such wider benefits must not be viewed as 'compensation' for a poorly designed development but as a necessary contribution to delivering a connected and easily accessible place.

Legal agreements and Community Infrastructure Levy (CIL) payments can help to fund such changes; but their design and location matter, so negotiating this through the planning application process can be useful. Masterplans, area strategies and proposals for wider public realm improvements will all help to deliver better outcomes.



How can we achieve well-designed places?

Involve people

NPPF Paragraph 16 says plans should:
'Be prepared positively, in a way that is aspirational but deliverable; be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.'

Making planning and design processes work well depends on getting the most from all these people. The knowledge that local people have of what works well, and what doesn't, is important. Bringing people together early in the process contributes to good planning by ensuring that local knowledge, ambitions and needs are considered throughout the process of policy and plan making and create a sense of belonging.

Politicians represent both the interest of existing and future communities. It is an important and sometimes challenging role to play. You will need to balance the interests of individual constituents, the wider social needs of the local community, and the broader requirements of business, the local economy and the environment.

It is important for communities (not just community leaders) to become involved in making plans and responding to planning proposals. There are always a variety of interest groups, many of them overlapping. Some interests will be held in common, while others will conflict, and there will be conflicts in short-, medium- and long-term interests. Bringing people together at an early and meaningful stage in plan-making, Councillors can play an important role in working out how development can contribute to the greater good by promoting common interests.



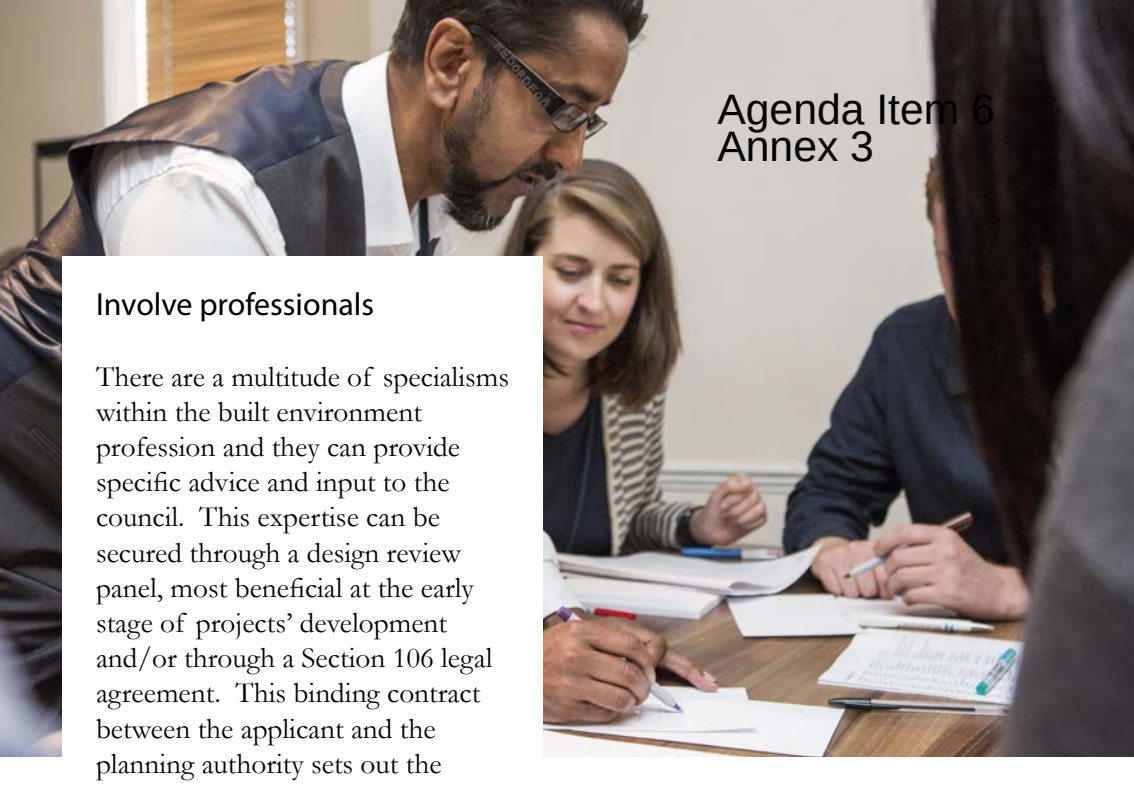
Left – Physical models of schemes help people understand. Different models can be used through all stages of the design process; concept, planning, detailed design and marketing. Bringing people together early in the process contributes to good planning

Although there is no statutory requirement for applicants to undertake pre-application consultation, Councillors should encourage developers to engage with local communities at the pre-application stage. The NPPF encourages (where appropriate) the preparation of design codes and independent advice through design review panels, both of which support pre-application scheme design evolution.

NPPF Paragraph 39 says that:
'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.'

Workshops, sometimes called charrettes, can be a useful way of engaging communities and other significant stakeholders in developing policies, masterplans or design briefs for specific sites, or in the early design of schemes. Digital technologies can help people understand places including applications such as Commonplace and Placecheck. In the case of important or strategic development proposals you should request a physical model so that locals can get to grips with its likely impact and potential benefits.

Increasingly, planning authorities are signing up to 3D computer modelling applications such as Vu.City that show the visual context of development accurately. Consider asking developers in your area to contribute financially to these tools to help communities understand development proposals. Neighbourhood planning is increasingly being used to enable local communities to pro-actively influence planning and development. Councillors can help create a neighbourhood plan by setting up a neighbourhood forum if you do not have a parish or town council. Local authorities should actively support neighbourhood planning and there are some resources available from Locality to help them do it.



Involve professionals

There are a multitude of specialisms within the built environment profession and they can provide specific advice and input to the council. This expertise can be secured through a design review panel, most beneficial at the early stage of projects' development and/or through a Section 106 legal agreement. This binding contract between the applicant and the planning authority sets out the framework for delivery. This may cover for example; resources to monitor and act on behalf of the council during the reserved matters phase of a project, the number of homes and amenities to be provided within the development, and requirements of a construction management plan.

Planning Performance Agreements can be useful on a larger schemes as a voluntary agreement between your planning authority, a developer and other parities to ensure expectations are met through the determination process, including the evolution of the design.



Above – Site visits with stakeholders are an invaluable way of experiencing and better understanding the character and potential opportunities of a place

Left – Setting out objectives and local need in plan making and through collaborative working will help deliver what is needed in your area

Involve other authorities

Beyond your local area, the government expects effective cooperation across administrative boundaries. NPPF Paragraphs 24-27 set out how neighbouring local planning authorities have a duty to cooperate with each other and with other prescribed bodies, such as county councils, national parks and combined authorities, on strategic matters that cross administrative boundaries.

NPPF Paragraph 20 states that: *'Strategic policies should set out an overall strategy for the pattern, scale and quality of development...'*

This may be achieved through formal joint working, combined authorities, joint spatial plans, and strategic policies on quality in combined plans.

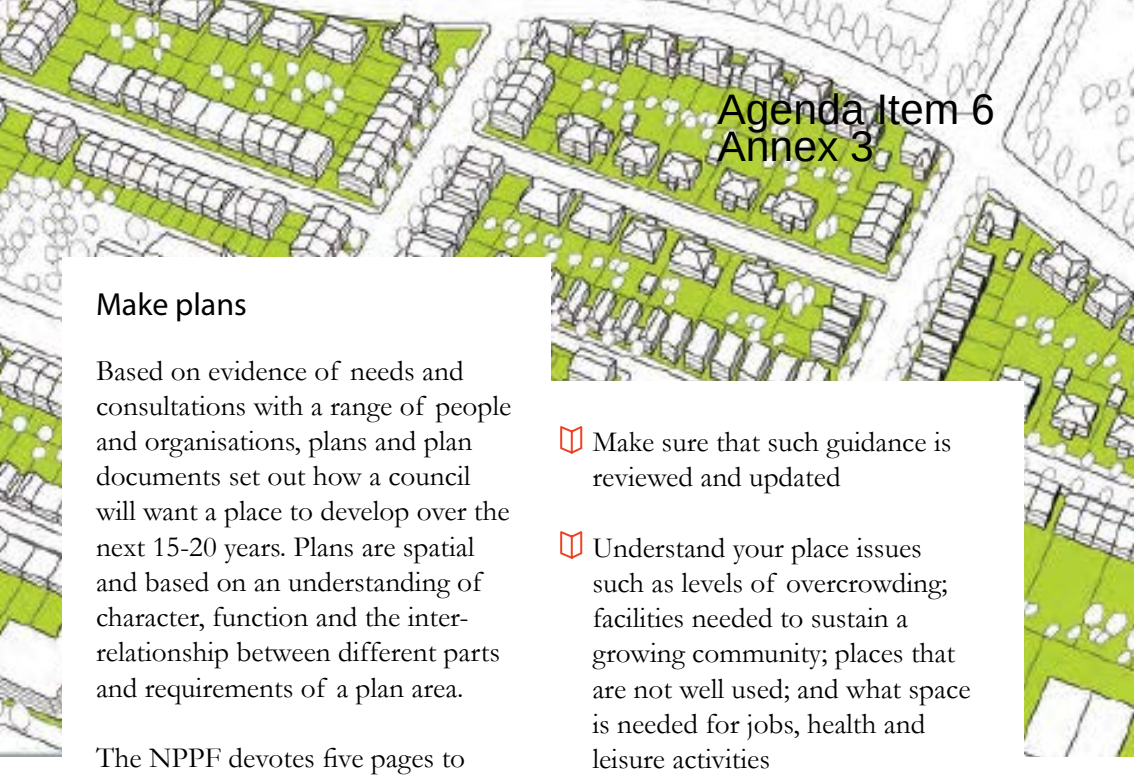
NPPF Paragraph 40 acknowledges: the key role local planning authorities have *'In encouraging other parties to take maximum advantage of the pre-application stage,'* although it does not require developers to do this.

Building relationships locally and making plans together, and across administrative and political boundaries, will take time and need resourcing.

Meeting with neighbouring authority Councillors, encouraging good design and working together to get homes and local amenities delivered can benefit communities. Often our municipal boundaries do not align with communities of interest or local need.



Above – Establish good relationships with neighbouring authorities, neighbouring Councillors and work together for the benefit of all



Make plans

Based on evidence of needs and consultations with a range of people and organisations, plans and plan documents set out how a council will want a place to develop over the next 15-20 years. Plans are spatial and based on an understanding of character, function and the inter-relationship between different parts and requirements of a plan area.

The NPPF devotes five pages to plan-making (Paragraphs 15-37). It strongly encourages local planning authorities to have a plan that addresses the strategic priorities and sets out housing targets for the area. If there is not an adapted local plan, refusals of planning permission are unlikely to be upheld at appeal. This may result in speculative development and places that are poorly designed, and fail to respond to local needs or offer public benefits.

It is important that Councillors get involved as early as possible with plan-making: with your local plan, supplementary planning documents, masterplans and neighbourhood plans. Find out where these are in the process, work with officers, and involve as many other people, community leaders and groups as you can. You should:

- Find out what design policies are in the plan and if you have Supplementary Planning Documents (SPDs), which add further detail to the policies.
- Make sure that such guidance is reviewed and updated
- Understand your place issues such as levels of overcrowding; facilities needed to sustain a growing community; places that are not well used; and what space is needed for jobs, health and leisure activities
- Tell planning officers what is needed in your area and where you see the opportunities to provide this. The sooner these needs are part of the area plan, the greater the likelihood they will be delivered
- Work with the wider community to plan for future generations by understanding population trends and local need. Consider and plan for what movement networks will be required to access homes, community amenities, jobs, health facilities, leisure and shopping areas

NPPF Paragraph 15 states that:
'The planning system should be genuinely plan-led: succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings'

Influence design quality

There are different ways and tools to positively influence design quality and the NPPF encourages the use of these.

NPPF Paragraph 126 says that:
'To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes'
It explains that 'local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development.'

Design review, design codes and assessment frameworks such as Building for Life 12 can help to raise standards of development.

Design & Access Statement (DAS) preparation is a requirement for many planning applications. The statement must set out how a proposed development is a suitable response to the site and its setting, demonstrating it can be appropriately accessed by users; it also sets out the consultation steps taken by the applicant, allowing Councillors to understand whether local engagement and early design evolution have taken local considerations into account

A Statement of Community Involvement may be required, to demonstrate that participation and consultation have been taken into account in the design evolution.

Design review is best undertaken early in a project's life as it is an opportunity for the design approach to be constructively evaluated and critiqued by experts.

Having a further design review at a later stage can help to ensure that detailed design stages create development that will meet the needs of all the people who will use it and be affected by it.

A design code is a document that sets rules for the design of new development within a development or area, particularly where it may be built out in more than one phase and by more than one developer. It is a mechanism that enables design guidelines or standards to be established and gives instructions to the degree or precision of more detailed design work that the development is expected to meet.

Assessment frameworks, such as 'Building for Life 12: the sign of a good place to live', are also encouraged in the NPPF. They are useful ways to both structure a discussion about a housing scheme, ensuing that all important practical issues are covered, and to assess the scheme when it has been built.



NPPF Paragraph 129 notes that: planning authorities 'should have regard to the outcome of these processes, including any recommendations made by design review panels.'

The key to influencing good design in your area is to understand how places work, or could work better; and how a place is used and if it is fit for purpose. You can then discuss how change can make places work better for people.

The following points help you to influence and maintain design quality in relation to individual planning applications and proposals:

- **Encourage the use of design review,** tools and frameworks, as set out above
- **Ask to see pre-application drawings** and, with officers (on site if practical), discuss the good and the bad aspects of any development, how it might work for the neighbourhood, and what your community will or will not want to see
- **Enquire** if applicants have undertaken a context appraisal on their proposals to show how the scheme relates to its neighbours and makes the most of its setting
- **Engage with developers**, letting them know what you need in your area and responding to their consultations
- **Encourage people** to get involved early in the process, through consultations and public engagement
- **Promote the benefits** of good design; ensure that every new development or space is fit for purpose and well built
- **Ask to see details** and samples of building materials, and make sure that they are specified in planning conditions, where necessary, so that the quality cannot later be reduced
- **Visit built schemes** that you have been involved with and learn what could be improved in future
- **Encourage post-occupancy surveys** so residents can comment on the success of a development once built, to help improve future developments

Left – Get people involved early on in the process

NPPF Paragraph 124 states that:
Planning policies and decisions *'should support the creation of high quality buildings and places,'*
It expects that local design policies should be developed with local communities to reflect local aspirations, and that plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what sort of development is likely to be acceptable.

Retaining quality

After approval, design codes, materials and other planning conditions, including retaining architects to guard against the dilution of architectural quality post-permission, can be insisted on. These conditions can be written into a Section 106 legal agreement between the applicant and the planning authority.

The government commissioned independent review by Dame Judith Hackitt revealed the importance of design quality surviving from permission to build out. Hackitt said that, *'value engineering is anything but value, it is cutting costs and quality. The structure of industry has to change to make it more effective.*

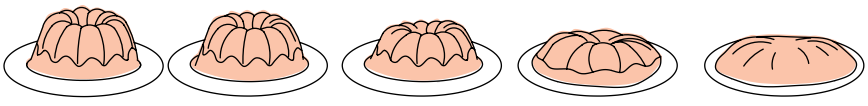
We need to put a focus on the way in which buildings are procured. If we have a process that makes people bid at a cost they can't afford to deliver at, we set ourselves up to fail.'

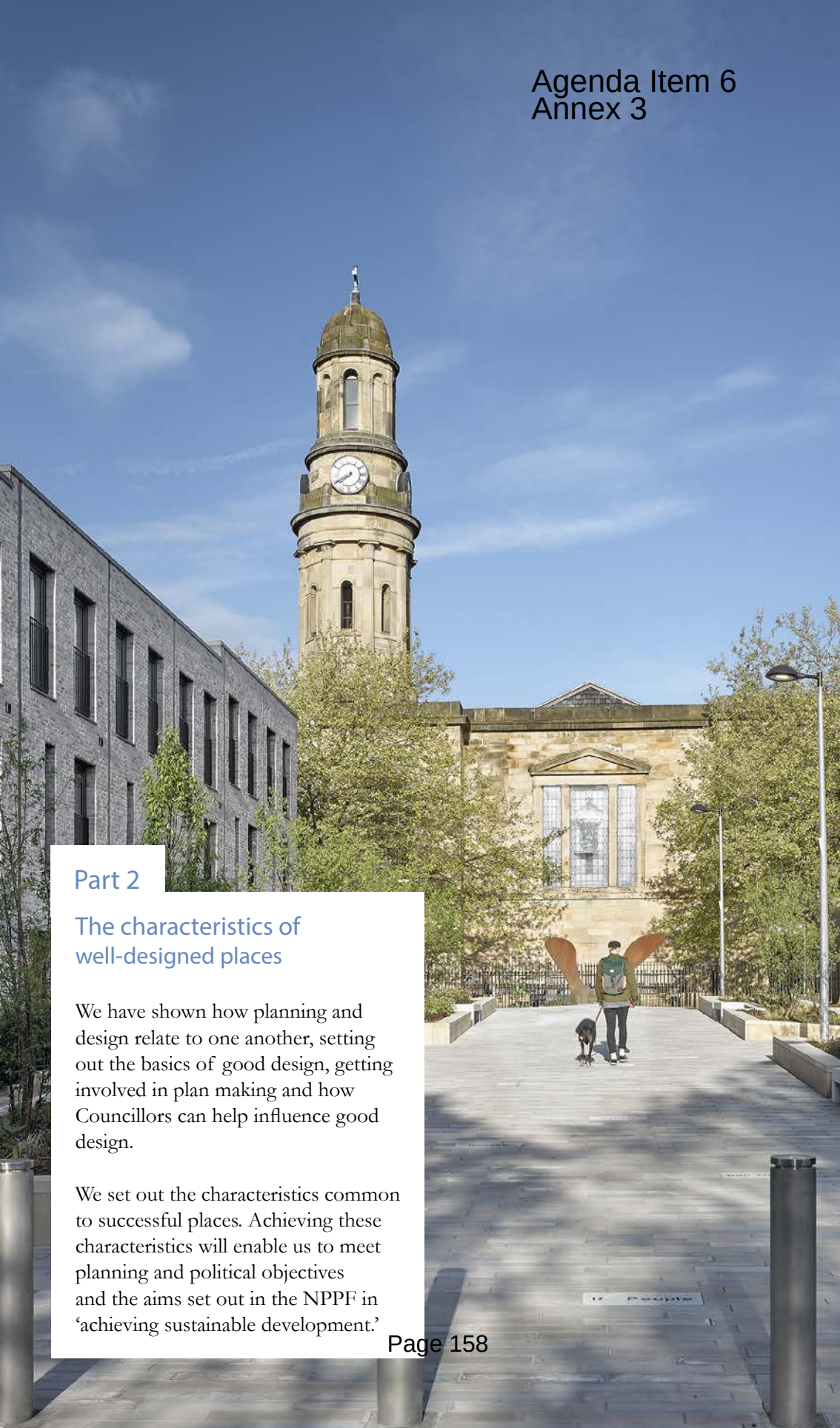
Hackitt said the industry needed to focus on the health and wellbeing of the general public rather than focusing just on its workforce. *'People are looking for quick fixes but they need to understand that root-and-branch reform is required. [Grenfell] has to be a turning point to bring about the culture change we need.'*

To achieve well-designed places community leaders must secure the integrity of the design and detailing from permission to completion.

Insist that quality is retained throughout the process to avoid your consented development turning into the constructed project, instead of deteriorating like neglected jelly.

The Design Network and other bodies can help you in your role as an elected leader of your community and to avoid common pitfalls. As well as design review, they offer a range of learning, briefing and networking events tailored to suit your local requirements.





Part 2

The characteristics of well-designed places

We have shown how planning and design relate to one another, setting out the basics of good design, getting involved in plan making and how Councillors can help influence good design.

We set out the characteristics common to successful places. Achieving these characteristics will enable us to meet planning and political objectives and the aims set out in the NPPF in 'achieving sustainable development.'

Left – The use of sympathetic materials in the public realm has created a distinctive, quality space

These characteristics relate to how we use and experience places.

They are:

- Having a complementary mix of uses and activities
- Being fit for purpose, accommodating uses well
- Encouraging easy movement
- Creating high-quality public space
- Being adaptable to changing needs and circumstances
- Being efficient in how land and other resources are used
- Having an appearance that is appealing and appreciated
- Having a distinctive, positive identity and sense of place

A mix of uses and activities

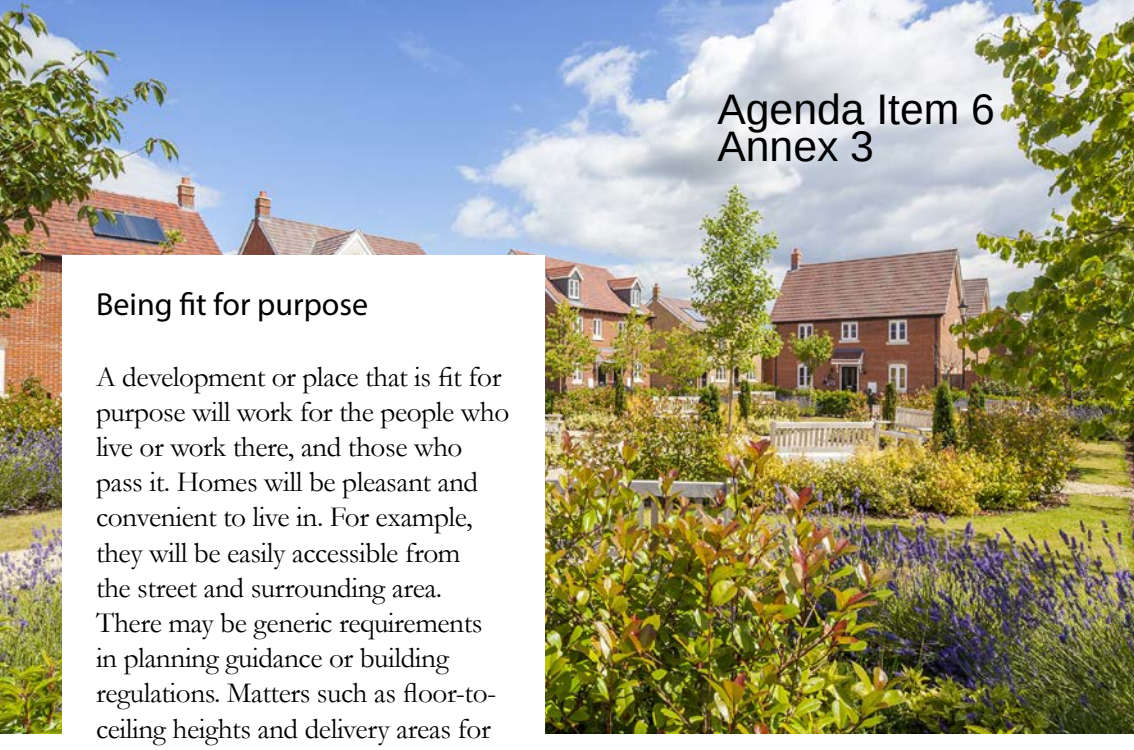
Uses are the activities, occupations, businesses or operations carried out in a building or on land. They help to determine the life and vitality of a place. Different uses need to work together, be in the right place and have users to support them.

Some uses rely on other uses to work properly. For example, chemists are well located near doctors' surgeries, and nursery schools near homes. Sometimes uses can work well together: sharing a building, split across floors, or facing each other across a street, where people and servicing can come and go with minimal disturbance.
As a local Councillor you will know about local demand for particular uses and whether they may be viable in the longer-term.

Think about:

- How different uses relate to transport infrastructure and patterns of movement
- How the different uses and activities will be serviced and supported
- How the different uses will complement one another
- How any potential conflicts between different uses can be managed or designed out
- How the place can allow for changing uses and activities over a day, a week or a season





Being fit for purpose

A development or place that is fit for purpose will work for the people who live or work there, and those who pass it. Homes will be pleasant and convenient to live in. For example, they will be easily accessible from the street and surrounding area. There may be generic requirements in planning guidance or building regulations. Matters such as floor-to-ceiling heights and delivery areas for shops, and noise, privacy and internal storage space for homes. These standards can help in understanding how a place can be fit for purpose.

Think about:

- How a development will meet the specific needs of its users
- How easy it will be to maintain and manage
- How convenient it will be to access deliveries and servicing, such as waste removal
- How easy play and social spaces will be to get to and supervise
- How adequate levels of sunlight and daylight are assessed, and if they make sense
- How the microclimate may impact on a place and affect comfort levels



Above – Uncluttered public realm detailing in Sheffield has incorporated lighting adjacent to tree pits and clear pedestrian routes into town

Top – A well landscaped, convenient and pleasant space for meeting neighbours at Windmill Place, Thame.

Easy to get around

To create a successful place it is important to consider how easy it is for people to get around and how well a development is connected to the surrounding area. Routes and movements between places and spaces need to feel safe, comfortable and convenient for everyone, ensuring that there is sufficient capacity for the pedestrians and vehicles that use them.

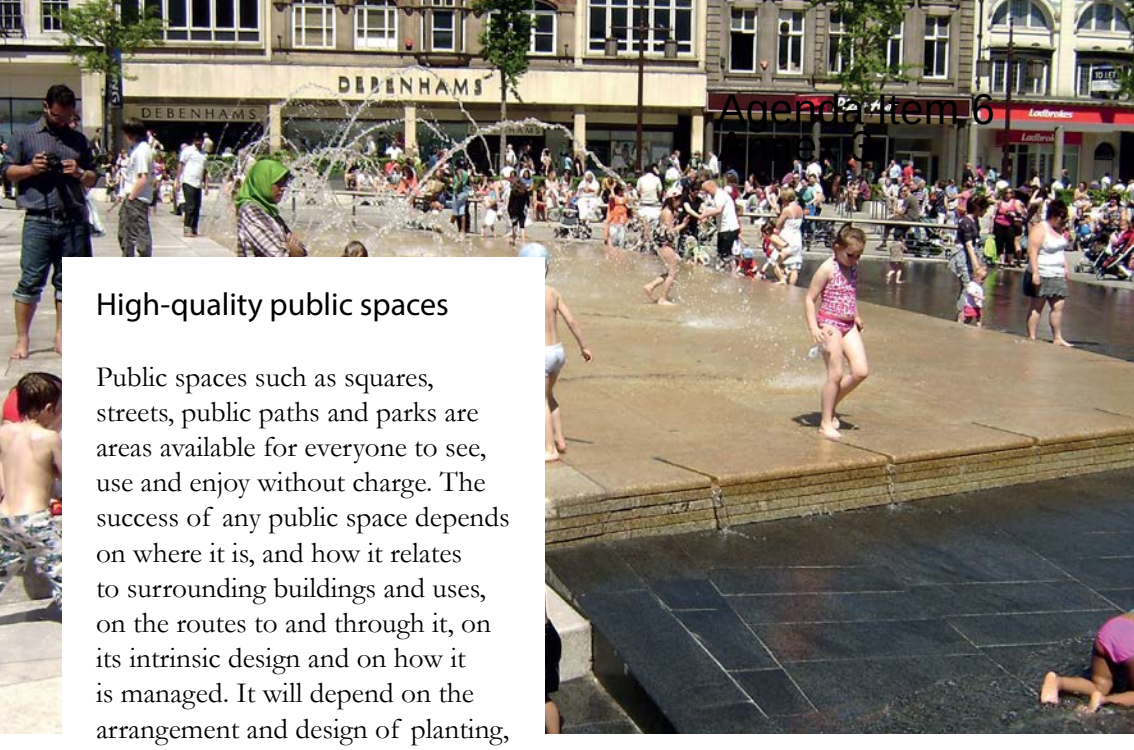
Streets, roads, footpaths and cycle-ways can encourage easy movement by giving people a choice of routes to the places they want to get to. Streets are more than just traffic channels for vehicles: they are places for people. Well-designed streets encourage people to use them and make being outside a safer and more pleasant experience.



Above – This elderly cyclist decided to ride on the wrong side of the road; however as the street is designed for slower vehicle movement, drivers were able to carefully, and safely, pass him.

Think about:

- **The movement network** – is it efficient, useful and easy to understand?
- **Desire lines** – can you get to places quickly and directly?
- **Inclusive environments** – can everyone move around easily irrespective of age or ability?
- **People first** – support designs which consider the most vulnerable users first. The hierarchy is pedestrians first, followed by cyclists and public transport users, with motor vehicle users last
- **Discourage places** that allow cars to dominate physically and visually
- **What opportunities** there are for development to improve connections in the area?



High-quality public spaces

Public spaces such as squares, streets, public paths and parks are areas available for everyone to see, use and enjoy without charge. The success of any public space depends on where it is, and how it relates to surrounding buildings and uses, on the routes to and through it, on its intrinsic design and on how it is managed. It will depend on the arrangement and design of planting, paving, lighting, orientation, shelter, signage, street furniture and how well these are maintained.

Public spaces can be full at lunch time or after school, and have quieter periods during the day or late evening. Make sure that the space caters for a wide range of users, no matter the time of day.

Think about:

- The types of spaces, and how buildings help to frame, enclose, oversee and activate streets and public spaces
- Whether the proportions of spaces and buildings help to create a pleasing and comfortable place
- How an area's spaces contribute to its identity
- The effect of buildings on the public realm microclimate
- Whether public spaces are located at centres of activity and through routes
- How well a space will be landscaped through planting, surfacing and furnishing, and how well it will be maintained
- What is unique to the place and how local distinctiveness can be retained where historic boundaries, building lines and plot sizes are significant

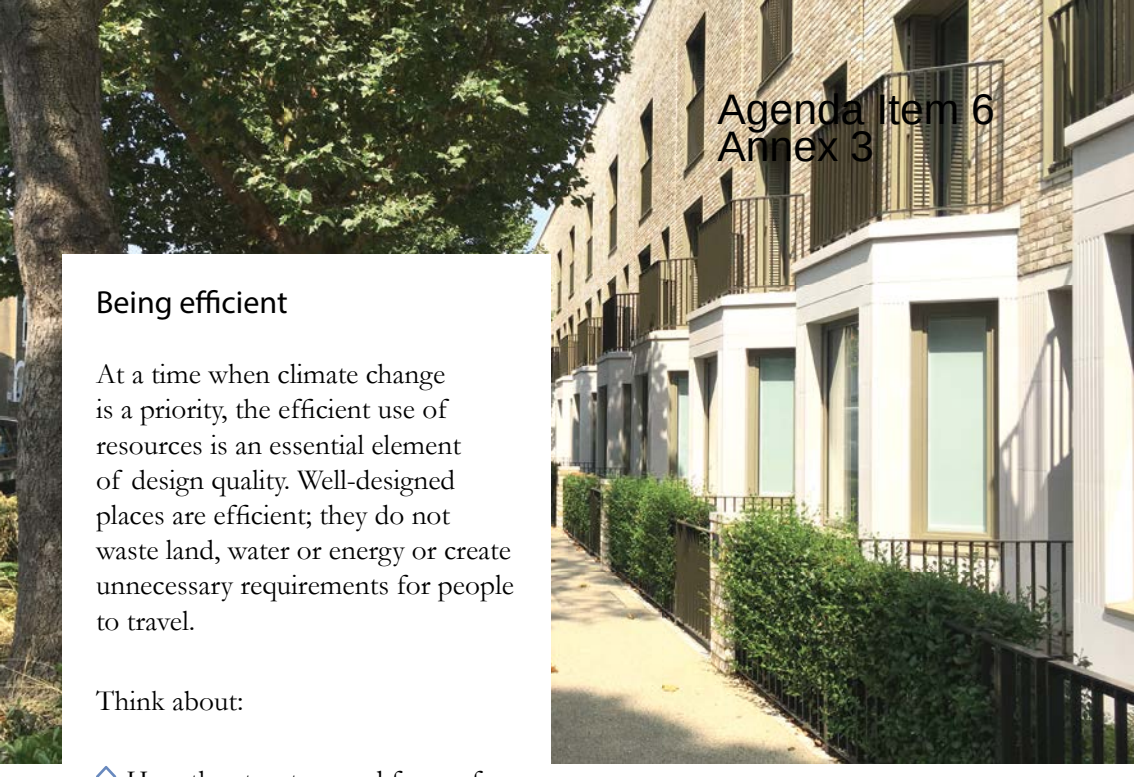
Left – The dramatic re-design of Nottingham city's historic central Market Square has transformed the area into a lively centre of community activity and higher retail footfall

Being adaptable

Successful places flourish under changing conditions by being adaptable. Adaptable buildings and places are able to accommodate new or shared uses and changing demands and circumstances. They are capable of having a long life without inconvenient or expensive renovations and by avoiding unnecessary demolition.

Think about:

- How a development may help prevent climate change
- How a place can be made adaptable by planning a network of streets and paths, with street width and block sizes that can accommodate very different forms of development in future
- How the place will be able to adapt to changing working practices and demands in office and industrial buildings, and changing living and home working circumstances
- Whether there is potential to adapt over time; making changes such as subdividing space, dividing and adding entrances and servicing, putting in or taking out stairs and lifts, and changing servicing requirements
- How the place's identity has been shaped by its ability to adapt in the past



Being efficient

At a time when climate change is a priority, the efficient use of resources is an essential element of design quality. Well-designed places are efficient; they do not waste land, water or energy or create unnecessary requirements for people to travel.

Think about:

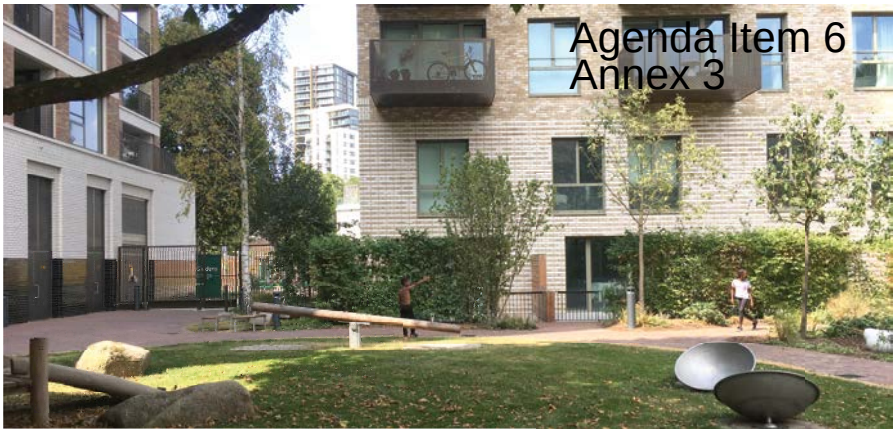
- How the structure and form of a place make it efficient to use and maintain, for example, by making it easy to walk to school.
- How well existing buildings or other elements are used, even if for only a short time.
- How the design of a place affects its need for energy through the creation of solar gain, overshadowing or cross-ventilation.
- How well waste is dealt with and whether there is scope for community based recycling or composting.
- How well rain water is dealt with, for example whether it is stored and used, and if the run-off will be slowed down through sustainable urban drainage systems.
- How demand for energy can be minimised and how the energy needed can be created locally or with the fewest negative impacts on the environment.

An appealing appearance

The visual appearance of a development is often created through architectural treatments. Understanding why a particular approach to a development's appearance has been taken, and how this fits with local policies and priorities, will help identify its suitability for an area.

Think about:

- How buildings and streets integrate with the area's natural setting, and how they relate to views, the skyline and landmarks in the area.



- The proportions of buildings and their elements, and how well these relate to the whole.

- How much thought has been given to the relationship between one part of the development and another, between each part and the whole, between solid and void elements of the facade (walls and windows), and between the proposed development and its surroundings.

- The order expressed in designs, including the extent to which balance, repetition and symmetry contribute to a pleasing sense of order, where this is appropriate.

- The style or styles used, and whether this emulates a local vernacular, incorporating or interpreting the form and details of local traditional buildings. Whether the style used is done well, or if a few details are being mindlessly copied without capturing any of the essential identity of the original.



Above – The consideration of plot dimensions help to create buildings with distinctive character along the River Sheaf in Sheffield

Top right– Landscaping, along with simple play equipment has made an attractive communal garden in Elephant Park, Southwark

Top left – Passivhaus town houses and flats responding to a traditional terraced street within a conservation area in Wansey Street, Southwark





Above – Different responses to context resulting in positive identities, Derwenthorpe, York

Left – Grey to Green rain gardens, Sheffield

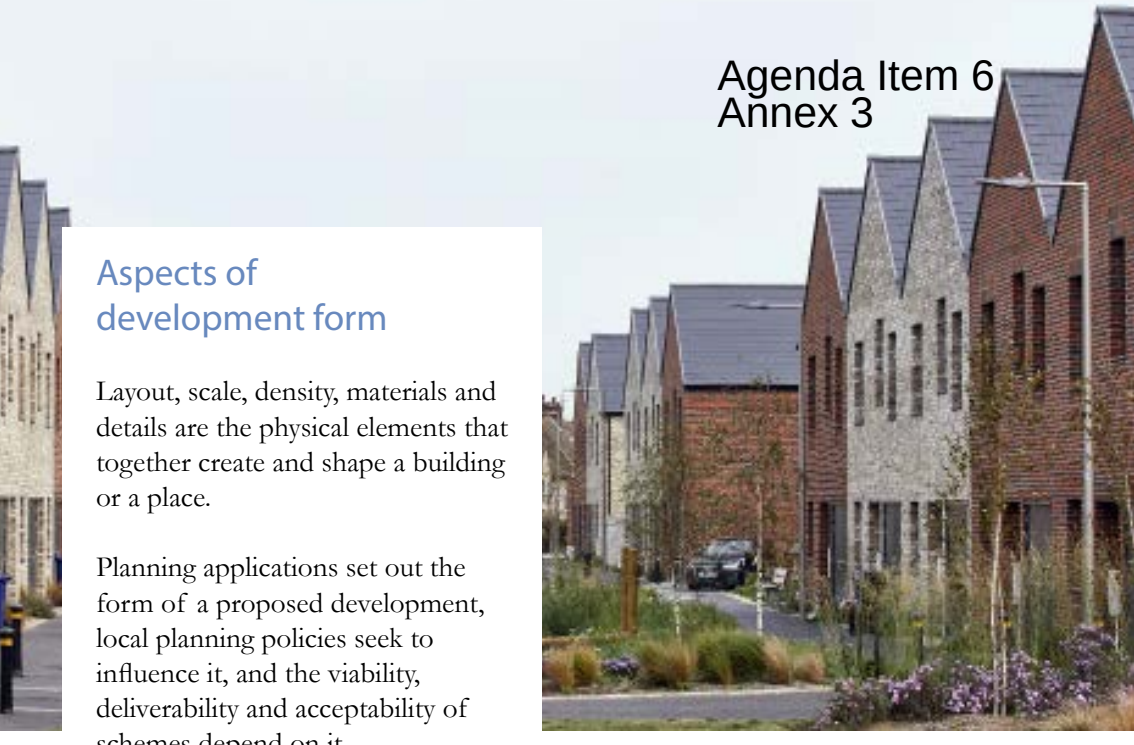


A positive identity

A place's identity is influenced by how people feel about an environment and the importance of belonging. It relates to current uses, how the place works, the patterns of movement, what the spaces are like and how they are enclosed, how adaptable and resilient the place is, how efficient it is in its use of resources and what it looks like.

Think about:

- The things that constitute the special identity and distinctive nature of any place being not the same for everyone
- What evidence can be gathered to evaluate all the elements that contribute to identity before making planning decisions
- How communities identify with with an area, and what important elements they contribute to its unique identity
- How discussions around identity or threats to what people hold dear can be highly emotive and raise fears about change
- In some situations, discussions about identity. are seen as a way to oppose development, hoping to make the scheme unviable or undeliverable



Aspects of development form

Layout, scale, density, materials and details are the physical elements that together create and shape a building or a place.

Planning applications set out the form of a proposed development, local planning policies seek to influence it, and the viability, deliverability and acceptability of schemes depend on it.

Aspects of development form are:

1 Layout
2 Scale
3 Density
4 Materials
5 Detail

Clear planning policies and design guidance can inform developers and development on what will be acceptable, or not, while conditions accompanying any permission can seek to ensure that details drawn up will be appropriate.

Layout

Layout is the way in which buildings, routes and open spaces are placed in relation to each other. It provides the two-dimensional structure on which all other aspects of the form and uses of a development depend.



Left – Plan of St Chad's Tilbury, Thurrock

Top – Creating links and connections to the wider area contributes to the vibrancy of streets: St Chad's Tilbury, Thurrock

Paragraph 127 of the NPPF says:
'Planning policies and decisions should aim to ensure that developments…optimise the potential of the site to accommodate development… and support local facilities and transport networks.'

Think about:

- Whether a new development will fit in well with the surrounding layout, link up with its routes, and feel like a homogenous part of the neighbourhood
- Whether the layout represents an efficient use of space and allows for a positive relationship between buildings and spaces
- Whether it will be clear what is private or public space, and whether front doors and windows to more public building uses will face public space
- How people will move around, and whether opportunities to provide the most direct and shortest routes for those walking and cycling have been taken, even if these routes are not open to motor vehicles
- Whether the layout respects the topography of the area, the character of the neighbourhood and the orientation of the site to ensure that it does not feel separate
- Whether the scale of development, streets and spaces feel appropriate to their surroundings, and for the uses to be accommodated. Remember, excessively large scale housing developments with single use can add to a sense of placelessness

Below - Through careful consideration of the layout this development links well with surrounding routes: St Chad's, Tilbury, Essex



Scale

Scale is the size of a building or other development in relation to its surroundings, or the size of parts of a building or its details, particularly in relation to the size of a person. The scale of a development is often expressed in terms of height and massing.

A tall building is often defined as a one that is significantly higher than most of its surrounding buildings or that significantly changes the skyline. The visual impact is not the only thing to consider. A tall building may introduce intensive land uses with different servicing and management requirements to those of surrounding buildings. It may have an impact on the microclimate and privacy of surrounding areas due to overlooking, shadowing and wind creation.

The design of buildings can be assessed, among other ways, by performance standards, such as assessing liveability and matters of home comforts such as noise, temperature and natural lighting. It is a basic right of residents and building users to be able to control their living and working conditions, regulating minimum and maximum temperatures, enjoying natural light and visual privacy, and minimising noise, without undue cost or difficulty.

Think about:

- The different dimensions that make up scale: not only height, but also depth and width. For schemes such as individual houses, remember that the depth will have an effect on the roof shape, potentially leading to excessively steep pitches.
- How the scale of the proposal fits with the surrounding area; whether the gradient or other topographic features will help to mask or accentuate it; and whether it will, in time, become integrated into the neighbourhood.



Left – We can question whether scale has been considered in this development, adjacent to and over-powering a listed public house

Right – Using distinctive materials, these houses are sensitive to the height and width of existing, adjacent homes

- What the development will feel and look like from the street.
- What the development will be like to live or work in, considering privacy and overlooking, natural light and ventilation.
- The impact of features described as landmarks, gateways and icons. Are they really needed? Will they deliver other benefits beyond just a dominant structure in the townscape?
- The scale of parts of the building as well as its whole, and how these will work on the ground and first floors, as experienced close up.
- The scale of spaces as well as buildings and the relationship between the two.

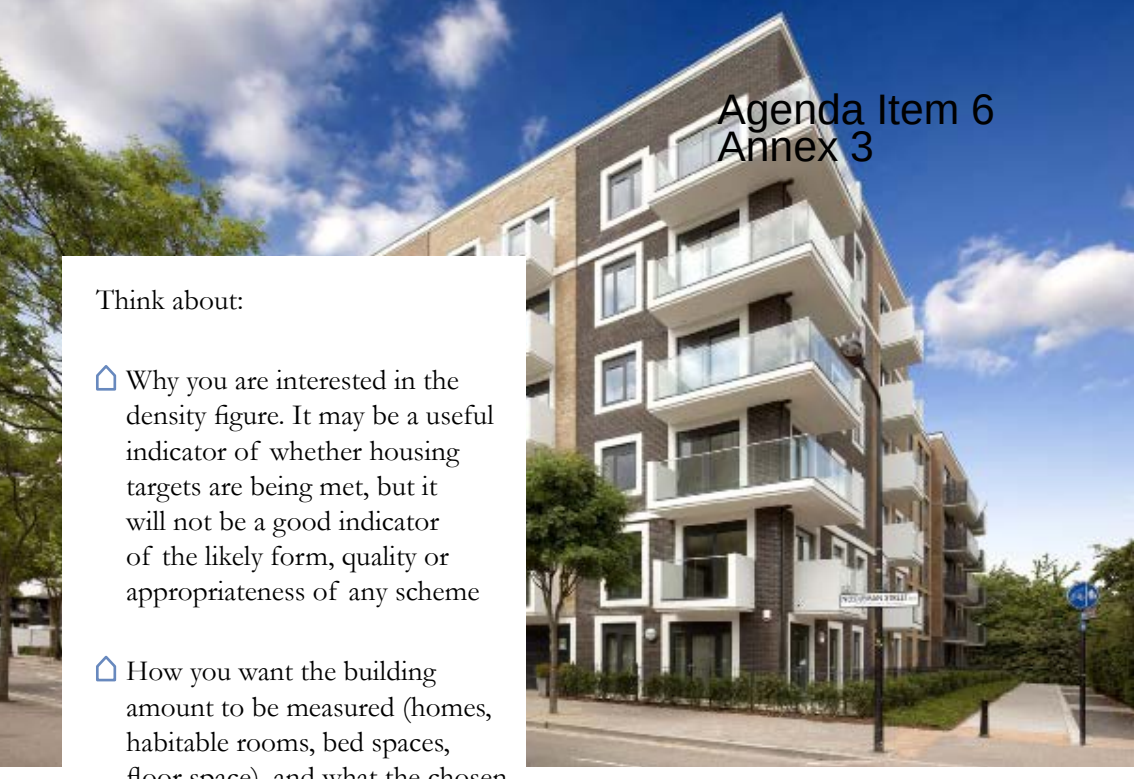


Density

Density is the amount of development on a given piece of land. The concept is important to planning and design as a means of managing growth targets, the amount of activity and the corresponding demand for services, influencing the scale and massing and making the best use of available land.

Higher densities generally mean more people in an area. This can be beneficial, leading to more customers for shops and restaurants, more justification for improvements to public transport and social facilities and more life in the streets and spaces. But it can also lead to increased pressure and demand on both space and services, and it can introduce conflict and a real or perceived reduction in peace, privacy and serenity. These are issues that will affect new residents and existing communities alike.

To deal with such issues it can be useful to ask about the carrying capacity of new and changing areas. Consider setting performance standards or spatial thresholds for matters such as the size of pavements, public spaces and amenity spaces. These can relate to the number of people who will need to use them, and how comfortable, clean and peaceful such places will be, for example.



Think about:

- Why you are interested in the density figure. It may be a useful indicator of whether housing targets are being met, but it will not be a good indicator of the likely form, quality or appropriateness of any scheme
- How you want the building amount to be measured (homes, habitable rooms, bed spaces, floor space), and what the chosen measure will tell you?
- Whether you are looking at net or gross densities, and whether these relate to housing and other land uses, and/or the size of the area being fed into the calculation
- What works in your area and the type of scheme and densities you feel can be accommodated
- What improvements might be required to the wider area if there are more residents, workers or visitors
- The fact that car parking uses a great deal of space, with a significant impact on density figures

Top – This distinctive corner block provides generous balconies, providing natural surveillance of the street and pleasant amenity spaces



Materials

Materials are the matter from which a development – buildings, structures and spaces – is made. The texture, colour and pattern of materials can all influence a developments' impact on the people who see it and use it, at the scale of individual buildings and the wider townscape.

Ask to see the materials proposed to be used to understand what they are made of, where they are from, and if they are of good quality and will last well. Use planning conditions to insist on the use of these specific materials to ensure that you get what you approved.



Above – Careful detailing and choice of materials can create distinctive places. St Chad's, Tilbury, Essex

Left – Provides eight one bed apartments in a tight infill site, minimising overlooking to existing homes, Challender Court, Bistol

Think about:

- Whether the materials are appropriate for the way in which they are to be used, whether they will last, and if they will be practical to clean and maintain
- Whether the materials relate well to the style and design ethos of the scheme; for example, whether traditional materials are being used for a sleek, minimalist modern style, or new materials for a vernacular approach
- Whether the materials complement those used in the surrounding area
- Whether the materials are locally sourced and will weather well in the local climate and air quality

Detail

How well a development works, and its impact on the people who use and experience it, will be influenced significantly by the detail: by the skill applied to its detailed design, by how its parts fit together, and by the care with which it is built.

Think about:

- The detailing might be what people will notice first about the new building or place, so secure specified materials in the planning permission.
- The care given to detailing a scheme illustrates the developer's approach and the long-term interest that they have in the quality of the area
- Detailing and materials go hand in hand. Some materials offer better opportunities for careful detailing than others
- Detailing can add visual depth, interest and individual character to both buildings and spaces. Window reveals, for example, give shadow and texture
- Detailing can mask less appealing functional requirements, such as binstores and drains
- Good brick detailing can add something special to a scheme, eliciting interest, acceptance and pride

Below – Blackfriars Circus using glazed tiles and brick detailing, London



Part 3
Things to watch out for

Taking into account aspects of form, how convenient your neighbourhood is to get around and how buildings relate to each other in scale, density and the materials and detailing, you will also be considering the characteristics common to successful places.

Here we consider basic design principles to look out for in the design of housing and streets. Planning policies can help to retain or create successful neighbourhoods. Your local plan will reflect local context, and other local plan documents will have further detail about what constitutes local identity and a sense of place.



Housing design

Having a roof over our heads is a fundamental human requirement. Making sure our homes are well designed can help to bring communities and neighbours together, support health and well-being, and reduce levels of crime and anti-social behaviour.

Better designed homes potentially benefit both developers and residents. Inventive and creative layouts can sometimes fit more dwellings on sites without jeopardising quality or character, while practical and durable materials, internal configurations and detailing can reduce maintenance and management costs. Housing should be durable, fit for purpose and beautiful.

Councillors can scrutinise housing schemes to ensure that quality is not being sacrificed for quantity. For example, policy in most authorities calls for homes to have windows facing in more than one direction (dual aspect) to ensure that those living in higher density neighbourhoods have sufficient light and ventilation, and that rooms have a variety of outlooks.

The following issues can help determine how well a place works:

Front-to-front and back-to-back

Most homes (and most buildings) have a public 'front' and a private 'back'. In the home the front door, the hall and a living space tend to be at the front, and the more private bedrooms and bathrooms at the back. Layouts that put the backs facing the backs of other homes, and fronts facing other fronts, tend to reinforce these uses of space, keeping the noise and activity to the front, and the peace and privacy to the back. This is helped by the type of open space located between and around the homes.

A public street between the fronts of homes can be the focus for comings and goings. Private gardens between the backs, by contrast, can uphold their quiet nature, without access for visitors or service vehicles. This traditional arrangement tends to work well. It can work in three dimensions too, with the private rooms and open spaces above the more public facing ones.

Active frontages

Doors and windows help to make frontages active, and they help buildings to give an impression of life, rather than the lifelessness of blank facades. Buildings with active frontages are accessed from the street front, and windows support that access. This gives the impression that the street is in constant use and is overlooked, making it less liable to experience anti-social behaviour such as urinating in the street or petty crime such as vandalism.

Careful housing design is needed to ensure that internal privacy and active overlooking from the home are both secured.

Waste storage and collection

Waste storage and collection have become a significant design issue for residential neighbourhoods since the arrival of the wheelie bin and the separation of waste for recycling. Today it is common in some neighbourhoods for residents to have three or more 240-litre wheelie bins. To complicate matters further, each waste authority has its own policy for the number and types of collections for waste disposal, making it difficult for housebuilders to produce a single strategy that works from one waste authority to the next.

Wheelie bins can be stored in rear gardens if there is easy access from the street. If the street needs to accommodate waste storage, the use of appropriately placed and scaled modular stores, integrated with landscaping, can hide two, or more wheelie bins.

It can be useful to ask for a 'waste-walk' plan. This will show how people from each home in a development will get their waste to the bins from where it can be collected. These routes should not be excessively long, or routed through closed doors, or areas where smells or dirt from the bins could cause problems.

Buffer zones

The area between the front door and wall of the home, on the one hand, and the public thoroughfare, on the other, can often usefully be thought of as a buffer zone or defensible space. These create semi-private areas for residents, shield the privacy of ground-floor units from the street, and ensure that parking does not dominate the street scene. This space can help to protect the privacy and quiet of the home itself, preventing people from coming right up to the front windows. It can also provide space for storage and an opportunity for residents to personalise their homes. Traditionally the space is taken up with a front garden or, for a building with a basement, a light well with or without steps.

In the case of a flatted development, the buffer zone can become even more important for ground-floor residents, especially if their only, or main, windows face the street, if the ceilings are not particularly high, or if the windows are the only way of getting fresh air into the home. Privacy can be provided by thoughtful landscaping and evergreen planting.

Street design

Traditionally the remit of engineers, the design of streets is a highly important area for planners to get involved in, as streets have a major impact on the usability and success of places. Streets are not the same as roads. Roads are mainly for transit; streets, which make up the vast majority of what is generally called the public highway, are about much more.

The main problem with many streets is that they have been designed as though their chief purpose were the movement of motor vehicles. Consequently they fail to achieve their full potential to serve buildings and their occupants, to enable people to move around on foot or by bicycle, and to be places simply to stay in and enjoy.

Manual for Streets and **Manual for Streets 2** are the best reference documents for Councillors wanting to understand the differences between streets and roads, how this relates to design, and the main technical matters to consider. Pages 15-20 of Manual for Streets are a good place to start.

This excerpt from the government's Planning Practice Guidance, paragraph 008, establishes an important consideration for street design:

'Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through. Attractive and well-connected permeable street networks encourage more people to walk and cycle to local destinations.'

'For this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities.'

A balance needs to be struck between providing for movement, on the one hand, and considering any particular street as a pleasant and usable place, on the other. Most types of street and road will have both movement and place functions, but often one function will be more important than the other.

Streets must be designed with an understanding that they are complex, that their design must not relate simply to their role in carrying motor traffic, and that (most streets being contained by buildings) decisions will have to be made as to how finite street space is laid out and attributed to different uses. Planning needs to engage with such decisions because they will have a direct impact on how well buildings, towns and cities work, and for whom.

Things that make good places

- Do not let cars dominate a residential scheme. If residents are going to need cars, make sure that they are properly accommodated
- Provide clear parking areas but look for ways to reduce reliance on the car, where practical
- Practical and attractive ways of managing the storage and collection of rubbish can make a major difference to the quality of a place
- Think about how the landscaping works, how it might also provide benefits such as sustainable urban drainage (SuDS) and wildlife areas and places for meeting, play and public art
- Residents value privacy, safety, comfort and a sense of belonging. Imagine if you would like to live in the proposed scheme, or if you would be happy seeing your parents or children living there
- Homes need both private and communal space. Such space needs to be appealing, practical and durable. The same space might not be able to serve a number of different purposes successfully, for example an access route with bin stores may not be a relaxing garden
- Consider how new development might change an area's microclimate, and if new and existing space will receive adequate daylight, sunlight and good ventilation
- Think about the heritage of a place as an irreplaceable resource to be conserved in a manner appropriate to its significance, and try to create an even better place



Above and below – both examples here from Leeds and Northampton, show parking and bin storage in rear courts without natural surveillance or easy access; this creates unpleasant places more likely to experience vandalism and anti-social behaviour



When we consider how to enhance and improve our area, its housing, streets or public spaces, we can return to the basic considerations of good design:

- Will it last well, being it durable and adaptable in the long-term?
- Will it work practically for residents, workers and visitors?
- Will most people think it looks good and is beautiful?



Above – Dominance of road space for traffic makes it harder for pedestrians to cross



Above – Without any buffer zone or defensible space consider how this room will be used and if residents will feel safe and secure

Glossary

Article 4 direction: A direction that withdraws automatic planning permission granted by the General Permitted Development Order.

character appraisal: Techniques for assessing the qualities of places, particularly conservation areas.

charrette: A design workshop; an event (ranging from a couple of hours to several days) that brings together a group of people to design and plan.

community infrastructure levy: A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

community right to build order: An order made by the local planning authority that grants planning permission for a site-specific development proposal or classes of development.

conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

conservation area: One designated by a local authority as possessing special architectural or historical interest. Buildings in a conservation area have extra protection against alterations to their appearance. The council will seek to preserve or enhance the character and appearance of such areas.

construction management plan: A document in which a developer describes all construction activity relating to a development in order to minimise the impact of the construction work on its surrounding neighbours.

design code: A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build on a design vision, such as a masterplan or other design and development framework for a site or area.

environmental impact assessment: A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.

historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

inclusive design: Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone.

local plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community.

local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area.

neighbourhood development order: An order made by a local planning authority through which a parish council or neighbourhood forum can grant planning permission for a specific development proposal or classes of development.

neighbourhood plan: A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area.

open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs).

planning condition: A condition imposed on a grant of planning permission or included in a local development order or neighbourhood development order.

planning obligation: A private agreement made between a local authority and a developer, which can be attached to a planning permission to make acceptable development which would otherwise be unacceptable in planning terms. Planning obligations are also known as Section 106 agreements.

renewable and low-carbon energy: Energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, the sun, and also from biomass and deep geothermal heat. Low-carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

spatial development strategy: A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan and plans prepared by combined authorities that have been given equivalent plan-making powers.

speculative development: Carried out without a particular customer in mind.

supplementary planning document: A document that adds further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Resources

National Planning Policy Framework
Planning Practice Guidance
Manual for Streets
Manual for Streets 2

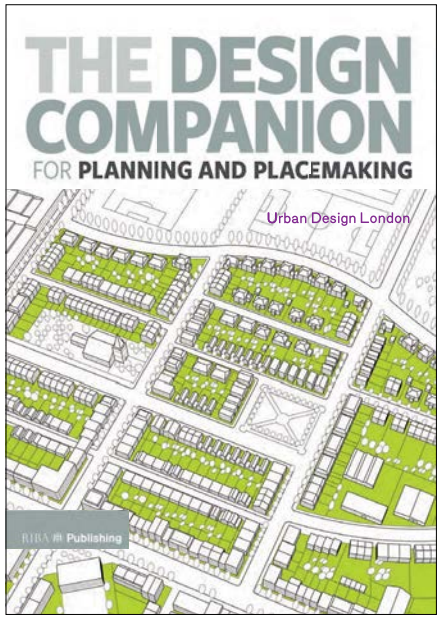
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For the collapsing jelly moulds, our thanks to MDAG.



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BIODIVERSITY: LOCAL PLAN BACKGROUND PAPER

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annex 1: Biodiversity Background Paper
Other available papers (not attached):	

Report summary

Council's officers have prepared a Biodiversity Background Paper as evidence for the emerging Local Plan.

The background paper is at a stage where Members can comment on the proposed approach for the preparation of the Local Plan.

Recommendation (s)

That the Committee:

(1) notes the content of the Biodiversity Background Paper attached at Annex 1; and

(2) subject to any additions or amendments, endorses the approach as set out in section 8.0 of Annex 1, for the preparation of the emerging Local Plan.

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

1.1 The delivery and implementation of the Epsom & Ewell Local Plan contributes towards all of the Council's Key Priorities.

1.2 The Biodiversity Background Paper will form part of the evidence base for the emerging Local Plan.

2 Background

2.1 It is important that the emerging Local Plan is prepared having regard for the biodiversity and nature conservation of the borough. The Local Plan needs to be prepared taking account of national planning policy guidance, relevant legislation and case law, local and regional monitoring data.

2.2 The new Local Plan will consider all aspects of planning for Epsom & Ewell's natural environment. While this background paper specifically focuses on the protection and enhancement of biodiversity in Epsom & Ewell, biodiversity and related matters will also be considered within other Local Plan evidence on open space, green infrastructure and as part of the health and well-being of residents.

3 Proposals

3.1 The background paper details the biodiversity of the borough, identifying the Sites of Special Scientific Interest (SSSI), non-statutory designations including Local Nature Reserves, Ancient Woodlands and Sites of Nature Conservation Importance (SNCIs). The background paper also identifies the Biodiversity Opportunity Areas (BOA's) in the borough.

3.2 Having regard for the evidence it is proposed, in section 8.0 of the background paper, attached at Annex 1 that the emerging Local Plan be prepared as follows:

3.2.1 Epsom and Ewell Ecological Assets

Identify (or confirm) the following local networks as the 'Epsom and Ewell ecological network' for protection in the new Local Plan:

- International, national and locally designated sites of importance for biodiversity;
- Surrey Priority Habitat and Species (and their habitats);
- Habitat buffer zones, wildlife corridors and the stepping stones that connect them.

3.2.2 Recreational Disturbance

- Measures should be proposed to ensure sites of biodiversity significance are protected from excessive disturbance from unacceptable erosion or pollution.

3.2.3 Water Quality

- Acknowledge the water quality issues and gaps in the evidence base in the Local Plan, and that it will be necessary to respond to emerging evidence to determine whether housing in the later stages of the plan period would require appropriate mitigation

- Pursue higher water efficiency standards in the new Local Plan in order to be consistent with other local authorities in the sub-region and to recognise the water stress issue in the south-east of England.

3.2.4 Air Quality

- Take account of any emerging evidence on air pollution and the impacts on habitat sites from the Habitats Regulations Assessment (HRA) of the Local Plan and other sources.

- Highlight air quality concerns as key issue for the Council's HRA and Sustainability Appraisal (SA).

3.2.5 Achieving Net Gains in Biodiversity

- Include outline advice on achieving net gains in development proposals in the Local Plan, based on a knowledge of the local ecological networks and include reference to examples.

- Advise that the Council's approach to biodiversity will be supplemented by further advice in a Supplementary Planning Document (SPD) at a later date.

3.2.6 Appraisal of the Local Plan

- Ensure HRA and SA processes are fully integrated into plan-making, including the consideration of strategic projects, and informs the development of the Local Plan at all stages.

4 Financial and Manpower Implications

4.1 The Biodiversity Background Paper has been prepared by officers. The proposed approach for preparing the emerging Local Plan as set out in Section 8.0 of the Background Paper includes ensuring the Local Plan has been prepared along with a HRA and SA. The HRA has been commissioned and is being prepared by external experts, with the SA being prepared by officers.

4.2 The Background Report highlights that there may be a need in the future as part of an adopted Local Plan for a SPD to be produced to further ensure a biodiversity net gain approach is secured.

4.3 ***Chief Finance Officer's comments:***

5 Legal Implications (including implications for matters relating to equality)

5.1 There are no legal implications arising from the contents of this report.

5.2 ***Monitoring Officer's comments: none arising from the contents of this report.***

6 Sustainability Policy and Community Safety Implications

6.1 The preparation of a sound Local Plan requires evidence which the Biodiversity Background Paper is a part. The Local Plan contributes towards the Council's objectives for maintaining and enhancing the Borough as a sustainable place to live, work and visit.

7 Partnerships

7.1 None for the purposes of this report.

8 Risk Assessment

8.1 The Biodiversity Background Paper sets out the legislative framework relating to biodiversity and nature conservation, and evidences the assets in the borough. The Local Plan needs to be prepared in line with the National Planning Policy Framework and associated legislation. By ensuring the emerging Local Plan is supported by a HRA and SA, this key risk is managed.

9 Conclusion and Recommendations

9.1 The Committee are requested to note the content of the Biodiversity Background Paper and subject to any additions or amendments, endorse the approach as set out in section 8.0 for the preparation of the emerging Local Plan.

Ward(s) affected: (All Wards);

Biodiversity and Epsom & Ewell







Background Paper

December 2019

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1. Introduction

This background paper considers the available evidence to develop an approach to biodiversity for the new Epsom & Ewell Local Plan 2017-2037, taking account of national planning policy guidance, relevant legislation and case law, local and regional monitoring data.

The new Local Plan will consider all aspects of planning for Epsom & Ewell's natural environment. While this background paper specifically focuses on the protection and enhancement of biodiversity in Epsom & Ewell, biodiversity and related matters will also be considered within other Local Plan evidence on open space, green infrastructure and as part of the health and well-being of residents.

Key biodiversity related terms are explained in a glossary in Appendix 1.

1.1 Biodiversity

Biodiversity encompasses the whole variety of life on Earth. It includes all species of plants and animals, their genetic variation, and the complex ecosystems of which they are part. It is not restricted to rare or threatened species but includes the whole of the natural world from the commonplace to the critically endangered. Reports indicate that global biodiversity has declined by more than a quarter in the last 35years, and that more than one in ten UK species are threatened with extinction.[1]

The 2016 update of the *State of Nature Report* identified 10 key factors leading to changes to the UK's wildlife over the last few decades, including modifications in the management of agriculture, forestry, water sources and habitats as well as habitat loss and fragmentation from climate change and urbanisation. Many habitats in England are now more fragmented than they were 50 years ago with smaller and more isolated patches of habitat. The report identifies that: *"many of the natural connections in our countryside have been degraded or lost, leading to isolation of sites… Many species are largely restricted to wildlife sites simply because they have mostly been lost from everywhere else. We need to take steps to rebuild nature."* [2]

While biodiversity is valued in its own right, the consequences of failing to conserve biodiversity would also lead to a range of adverse impacts on human life. The loss of biodiversity alters the capacity of ecosystems to deliver the 'goods and services' vital to sustaining well-being and future economic and social development. Ecosystem 'goods' include food, water, fuels and timber, while 'services' include provisions for air purification, wastes recycling, pollination and climate control. See Figure 1 for more details. To give one example, the decline of pollinator insects would have serious implications for agricultural production with an estimated 84% of Europe's crops having some degree of dependence on insect pollination. Pollinating insects are thought to contribute up to £440m to the UK economy every year.[3]

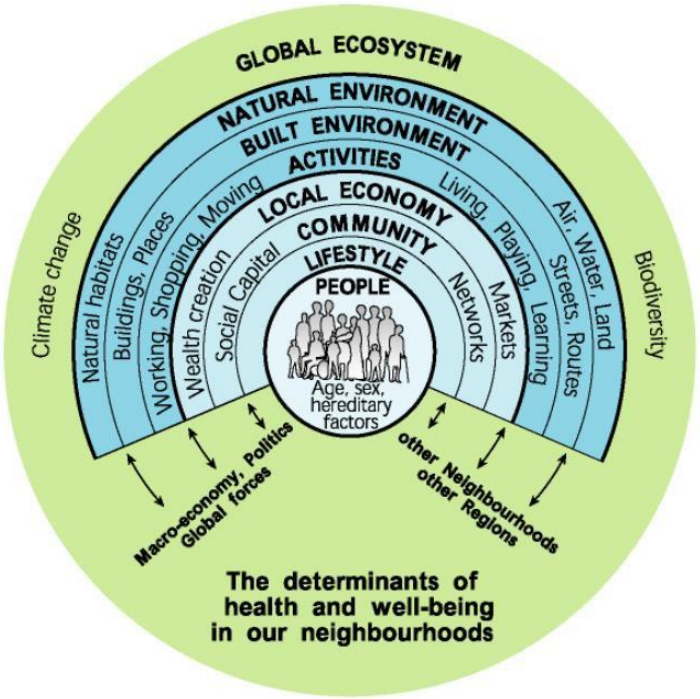
[1] PERFECT Interreg Europe (2018) Green infrastructure and biodiversity factsheet 2, p4
[2] RSPB (2016) State of Nature Report. Available from: https://www.rspb.org.uk/our-work/stateofnature2016/
[3] Dr Adam. J. et al (July 2014) status and value of pollinators and pollination services. A report to Defra

The global ecosystem and biodiversity are key overarching determinants of human health; the 'health map' in Figure 2 shows the interactions and relationships between people, their quality of life and their local and global environment.

Figure 1: Categories of ecosystem service:

- **Provisioning services -** these take the form of the physical products we obtain from the system such as construction materials, food, water, fuel etc.
- **Regulating services -** these are the benefits arising from the regulation of ecosystem services such as maintaining air quality, climate regulation, water purification and pollination.
- **Cultural services -** the non-physical benefits that the natural environment has for people such as mental wellbeing, spiritual wellbeing, spaces for recreation and social interaction and contributions towards heritage and cultural identity of places.
- **Supporting services -** this final category of services is different to the first three as their benefits are generally indirect for people, or expressed over much longer timescales. These are the services that support the provision of other ecosystem services, including photosynthesis, soil formation and maintenance, habitat provision, water/nutrient cycling.

Figure 2: Health Map[4]



[4] Barton, H. and Grant, M. (2006) A Health Map for the Local Human Habitat, Journal for the Royal Society for the Promotion of Public Health, 126.

1.2. Biodiversity in Epsom & Ewell

Epsom & Ewell's biodiversity is a product of its geology, climate and human activity over thousands of years.

A broad range of habitats and species can be found across the Borough and the neighbouring Surrey districts of Mole Valley and Reigate and Banstead and the London Boroughs of Kingston-Upon-Thames and Sutton. The Borough includes Sites of Special Scientific Interest (SSSI) as well as non-statutory designations including Local Nature Reserves, Ancient woodlands and Sites of Nature Conservation Importance (SNCIs). Together they help form a network of biodiverse areas both within and outside the Borough, including 'Biodiversity Opportunity Areas' for both chalk grassland, woodland and rivers.

Epsom & Ewell has a range of priority habitat falling under the broad categories of grasslands, woodlands, wood-pasture and parkland, arable, orchards, hedgerows, ponds and rivers.

Epsom & Ewell, despite its dense urban environment benefits from a greenbelt that includes some very large managed public open spaces such as Epsom Downs, Epsom Common Local Nature reserve, Nonsuch Park, the Hogsmill Local Nature Reserve and Horton Country Park Local Nature Reserve. The Epsom and Ashtead Commons Site of Special Scientific Interest is both of national and international importance for very rare insects associated with an exceptional collection of veteran trees.

The Epsom & Ewell Local Plan policies will aim to minimise the impact upon designated sites and seek to ensure new development results in a biodiversity net gain. In doing so, the Local Plan will in parallel mitigate the adverse impacts of climate change.

2 Policy context

Planning for biodiversity in Epsom & Ewell and neighboring areas is undertaken in the context of the information in this chapter.

2.1 Natural Environment and Rural Communities (NERC) Act (2006)

Section 40 of NERC Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions, including restoring or enhancing species populations or habitats. This is commonly referred to as the 'biodiversity duty'. This duty includes seeking to make a significant contribution to the achievement of the commitments made by government in its *Biodiversity 2020* strategy.

Local authorities must have regards to the potential effects of a development on the habitats or species listed in S.41 of the Act.

2.2 EU Directives and International Agreements

The *Conservation of Habitats and Species Regulations 2010* (as amended) transposes two pieces of European law - Directive 2009/147/EC on the conservation of wild birds ('the Birds Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna ('the Habitats Directive') – into domestic law. This legal framework seeks to protect the sites that provide ecological infrastructure for the protection of rare, endangered or vulnerable natural habitats and species of exceptional importance within the European Union. These

habitat sites consist of:

- Special Areas of Conservation (SACs), designated under the Habitats Directive
- Special Protection Areas (SPAs), designated under the Birds Directive

National planning policy guidance[5] adds protection equal to the above for the following sites:

- Listed and proposed Ramsar[6] sites - designated under the Convention on Wetlands of International Importance (UNESCO, 1971)
- Potential SPAs and possible SACs; and
- Sites identified, or required, as compensatory measures for adverse effects on SACs, SPAs, potential SPAs, possible SACs, and listed or proposed Ramsar sites.

National planning policy also confirms that where development requires Appropriate Assessment under the Habitat Directive, due to the potential impacts on a proposed or planned habitat site, the 'presumption in favour of sustainable development' does not apply.[7]

2.3 Habitat Regulations Assessment

Under the Habitats Directive, Habitat Regulations Assessment (HRA) is required for all plans and projects which are not wholly directly connected with, or necessary to, the conservation management of the site's qualifying features. An HRA incorporates the following stages:

Stage 1: Screening for likely significant effects

This will include formal screening for any *Likely Significant Effects* either alone or in combination with other plans or projects.

Stage 2: Appropriate Assessment

Where these effects cannot be excluded (by selecting alternative sites), assessing them in more detail through an A*ppropriate Assessment* (AA) is required. This is to ascertain whether an adverse effect on the ecological integrity of the site can be ruled out, either individually or in combination with other plans or projects, in view of the site's conservation objectives. The assessment takes a *precautionary principle* approach.

Stage 3: Mitigation measures and alternative solutions

Where an adverse effect on the site cannot be ruled out, and no *alternative solutions* can be identified, the project can then only proceed if there are *imperative reasons of over-riding public interest* (IROPI) and if the necessary mitigation or compensatory measures can be secured. The process should consider alternatives to the proposed actions and explore mitigation opportunities, whilst adhering to the precautionary principle.

2.4 Revised National Planning Policy Framework (Jul 2018) and National Planning Policy Guidance on the Natural Environment (2014)

[5] MHCLG (July 2018) National Planning Policy Framework para. 176
[6] The Ramsar Convention on wetlands is an international treaty for the conservation and sustainable use of wetlands. It is named after the city of Ramsar where the treaty was originally signed.
[7] MHCLG (July 2018) National Planning Policy Framework para. 177.

Improving biodiversity, as part of protecting and enhancing the natural environment, is listed as one the key objectives for achieving sustainable development in national planning policy. The National Planning Policy Framework states that planning policies and decisions should contribute to, and enhance, the natural and local environment by:

- Recognising the intrinsic character and beauty of the countryside, and **the wider benefits from natural capital and ecosystem services**, including the economic benefits of trees and woodland (para.170 b).

- **Minimising impacts on and providing net gains for biodiversity**, including by **establishing coherent ecological networks** that are more resilient to current and future pressures (170d);

Local Plans should therefore (para.171):

- **distinguish between the hierarchy of international, national and locally designated sites**.
- **Allocate land with the least environmental or amenity value**, where consistent with other policies in this Framework;
- Take a strategic approach to **maintaining and strengthening networks of habitats and green infrastructure**; and
- Plan for the **enhancement of natural capital[8] at a catchment or landscape scale** across local authority boundaries.

Specifically for the enhancement and protection of biodiversity (and geodiversity), plans should (para. 174):

- **Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks**, including the hierarchy designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation;
- **Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species**; and identify and **pursue opportunities for securing measurable net gains for biodiversity**.

Planning applications should be considered in terms of the following principles for biodiversity (para. 175):

- Refusal of planning permission if significant harm to biodiversity cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for.

- For Sites of Special Scientific Interest (SSSI), proposed development (within or outside the designation) likely to have an adverse effect (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development, in the location proposed, clearly outweigh both its likely impact on the site's qualifying features and any broader impacts on the national network of SSSIs;

- Supporting development where the primary objective is to conserve or enhance biodiversity;

- Encouraging opportunities to incorporate biodiversity improvements in and around

[8] Natural capital is the sum of our ecosystems, species, freshwater, land, soils, minerals, our air and our seas. These are all elements of nature that either directly or indirectly bring value to people and the country

developments (such as the wider biodiversity network) especially where this secures measurable net gains.

It is advised that local planning authorities should seek opportunities to work collaboratively with other partners, including Local Nature Partnerships, to develop a strategic approach to protecting and improving the natural environment based on local priorities and evidence.[9]

Further advice on the legal obligations relating to European sites, protected species and Sites of Special Scientific Interest is set out in government circular *Biodiversity And Geological Conservation – Statutory Obligations And Their Impact Within The Planning System*.

2.5 Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)

Biodiversity 2020 is a national strategy for England's wildlife and ecosystem services; it details how the UK will implement its international commitments to biodiversity conservation and is referenced in the current National Planning Policy Guidance on the Natural Environment (updated 2014). The Strategy sets out the government's ambition to halt the overall loss of England's biodiversity by 2020, support healthy well-functioning ecosystems and establish coherent ecological networks and with 'more and better places' for nature for the benefit of wildlife and people. These ambitions are to be delivered by the following actions.

- a more integrated large-scale approach to conservation on land and at sea;
- putting people at the heart of biodiversity policy;
- reducing environmental pressures; and
- improving our knowledge.

The UK's previous biodiversity strategy, *The UK Biodiversity Action Plan*, focused on the conservation of priority habitats and species. While this approach helped to ensure that important species and habitats were maintained and enhanced, overall biodiversity was still found to be declining. The approach of the Biodiversity 2020 strategy is based on key research that concluded that a larger scale approach to conservation was needed, of whole natural ecosystems, in order to support a greater diversity of species.

The more recently published *25-year Environment Plan* (Jan 2018) confirms that a new strategy for nature, building on the existing *Biodiversity 2020* strategy, is to be prepared.

2.6 25 Year Natural Environment Plan (Jan 2018)

The 25 Year Environment Plan details how the UK Government intends to 'leave our environment in a better state than we found it'. It identifies six key areas for actions which will affect, either directly or indirectly, biodiversity:

- Using and managing land sustainably
- Nature and enhancing the beauty of landscapes
- Connecting people with the environment to improve health and wellbeing
- Increasing resource efficiency, and reducing pollution and waste
- Securing clean, productive and biologically diverse seas and oceans
- Protecting and improving the global environment

[9] National Planning Policy Guidance on the Natural Environment (updated March 2014) para.008

The Plan notes the 'complimentary relationship' with the UK Industrial Strategy (Nov 2017) which includes 'clean growth' as one of four major challenge areas for Local Industrial

Strategies to tackle. The concept of natural capital evaluation, which has been incorporated into the revised NPPF (July 2018), is also a key cross cutting theme in this document[10]

2.7 Surrey Infrastructure Study 2017 Update

The Surrey Infrastructure Study[11] includes a section on Green Infrastructure provision across the County. It sets the future requirements to meet growth to 2031 across Surrey as:

- 106 ha Suitable Alternative Natural Green Space
- 42 ha New Parkland
- 21 ha Allotments.

2.8 Epsom & Ewell Local Biodiversity Action Plan (2010-2020)

The Epsom & Ewell Local Biodiversity Action Plan 2010-2020 (LBAP) describes the Borough's biodiversity and sets key objectives, targets and actions. Every year a Biodiversity Progress Report is published. The plan agreed back in 2010 contains 7 objectives, comprising 23 targets with 45 actions. These progress reports are available on our website.

The seven objectives of the plan are as follows:

Objective 1
Develop partnerships to ensure that the conservation and enhancement of biodiversity in Epsom and Ewell is maintained in the long term.

Objective 2
Ensure the conservation and enhancement of habitats and species, as specified nationally and in the Surrey Habitat Action Plans

Objective 3
Ensure opportunities for the conservation and enhancement of the whole biodiversity resource in Epsom and Ewell are identified considered and acted upon

Objective 4
Raise awareness, appreciation and involvement in the conservation and enhancement of biodiversity in Epsom and Ewell

Objective 5
Provide on-going monitoring of biodiversity in Epsom and Ewell

Objective 6
Seek to increase the funding available for the long term conservation, enhancement and monitoring of biodiversity in Epsom and Ewell

Objective 7

[10] Natural Capital Committee (Jan 2018) Economic valuation and its applications in natural l management and the Government's 25 Year Environment Plan
[11] https://www.surreycc.gov.uk/__data/assets/pdf_file/0007/163348/180307-Surrey-Infrastructure-Study-2017.pdf

Seek to identify the wider benefits to the community of improving biodiversity

The currently (LBAP 2010) identified semi natural and urban habitats within Epsom & Ewell are set out below. A full list of sites in Epsom & Ewell is in Appendix 3 of the LBAP:

Semi Natural habitats:

- Chalk Grassland
- Farmland
- Lowland Heathland
- Meadows
- Standing Open Water and large Reedbeds
- Wetland
- Woodland
- Wood Pasture and Parkland

Urban habitats:

- Managed Greenspace
- Regenerating habitats
- Areas of Urban semi-natural habitat
- Urban Wetlands

3 Epsom & Ewell Local Plan

The current approach to biodiversity and the natural environment in Epsom & Ewell is set out in *Epsom & Ewell Local Plan Core Strategy (2007) Policy CS3: Biodiversity and designated conservation areas* and the *Development Management Policies Document (2015*.

3.1 Core Strategy 2007

The Core Strategy Policy CS3 is as follows:

The biodiversity of Epsom and Ewell will be conserved and enhanced through the support for measures which meet the objectives of national and local biodiversity action plans in terms of species and habitat.

Sites that are designated for their nature conservation attributes will be afforded protection appropriate to their designation.

Sites of Special Scientific Interest and Ancient Woodland will be afforded the highest level of protection. Development which harms the scientific interest of these areas will not be permitted.

Development that would harm Grade 2, Grade 3 SNCIs or Local Nature Reserves will not be permitted unless:

- *suitable mitigation measures are put in place, and*
- *it has been demonstrated that the benefits of a development would outweigh the harm caused.*

Elsewhere, development that is detrimental to the Borough's biodiversity will be minimised, and where it does take place, adequate mitigating measures should be provided. Wherever possible, new development should contribute positively towards the Borough's biodiversity.

Policy CS3 has the following indicators, targets and delivery mechanism:

Indicators:

- *% of SSSIs in favourable condition or improving*
- *Number and area of Sites of Nature Conservation Importance (Grade 2), Sites of Nature Conservation Importance (Grade 3), and ancient woodlands*
- *Number of new developments providing mitigation for loss of biodiversity or / and incorporating features to improve existing biodiversity*

Targets:

- *95% of the SSSIs should be in a favourable or recovering condition by 2010 (Government Public Service Agreement target)*
- *Appropriate targets will be developed in the Development Control Policies DPD, informed by the local Biodiversity Action Plan*

Delivery Mechanism:

- *Through development control decisions and negotiation (for mitigation measures)*
- *By the effective management of designated sites*
- *By maintaining up to date information on local biodiversity (including the value of contributions from previously developed land)*
- *Production of a local Biodiversity Action Plan*

3.2 Development Management Policies Document 2015

The Development Management Policies document sets out more detailed policies for use by the Development Management function of the planning department when determining planning applications. This is reproduced below:

Policy DM4: Biodiversity and New development

Development affecting existing or proposed nature conservation sites and habitats of international, national or local importance will only be permitted if:

(i) The development would enhance the nature conservation potential of the site or is proven to be necessary for the conservation management of the site; or
(ii) there is no alternative location for the development and there would be no harm to the nature conservation potential of the site; or
(iii) there are imperative reasons of overriding public interest for the development

Elsewhere in the Borough:
Development affecting any site or building that supports species protected by Law, including their habitats, will only be permitted if appropriate mitigation and compensatory measures are agreed to facilitate the survival of the identified species, keep disturbance to a minimum and provide adequate alternative habitats to ensure no net loss of biodiversity.

Mitigation and compensatory measures will be secured through planning obligations or conditions, with priority for such measures to be provided within the development.

Whether or not there are any species or habitats that enjoy statutory protection, every opportunity should be taken to secure net benefit to the Borough's biodiversity. To this end, an

assessment of the existing nature conservation assets on a development site should be undertaken at the application stage and suitable biodiversity enhancements proposed.

3.2 Key Issues for the new Local Plan

The new Local Plan will replace the existing Core Strategy and Development Management Policies. In summary, the new Local Plan will need to consider the following:

- Importance of biodiversity for a range of planning objectives - ranging from the protection of the environment, health and well-being and economy to climate change.

- Protection and enhancement of Epsom & Ewell's unique environment, in collaboration with key consultees and partners, through the identification and protection of Epsom & Ewell's ecological networks.

- Minimising the impacts of development on biodiversity (such as the effects relating to urbanisation, recreational disturbance, climate change and changes to air and water quality) through Local Plan policies, partnership working and other sub-regional strategies, as part of ensuring and promoting the conservation, restoration and enhancement of habitats in Epsom & Ewell.

- Actively seeking biodiversity enhancements and overall net gains for biodiversity in Epsom & Ewell.

- Application of the 'mitigation hierarchy' ('avoid-mitigate-compensate') for development proposals that would result in significant harm to designated habitat sites and biodiversity in the Epsom & Ewell area.

- Appropriate monitoring to measure the effectiveness of biodiversity policy in achieving the above aims.

4 Epsom & Ewell's Ecological Networks

This section identifies the areas and species of significance for biodiversity in the Epsom & Ewell which form the 'Epsom & Ewell ecological networks' for protection in the Epsom & Ewell Local Plan. These Epsom & Ewell ecological networks are elements of wider networks across Surrey and represent part of the 'landscape-scale' approach to biodiversity conservation in the county.

4.1 International and National Habitat Sites

International Sites
There are no Natura 2000 ('international habitat sites') within the Borough. However, the Epsom & Ashtead Commons SSSI scores at the level of international importance for invertebrates associated with decaying wood.

The nearest sites to Epsom & Ewell are Wimbledon Common, the Mole Gap to Reigate Escarpment and the Thames Basin Heaths.

Habitat Sites of National Importance

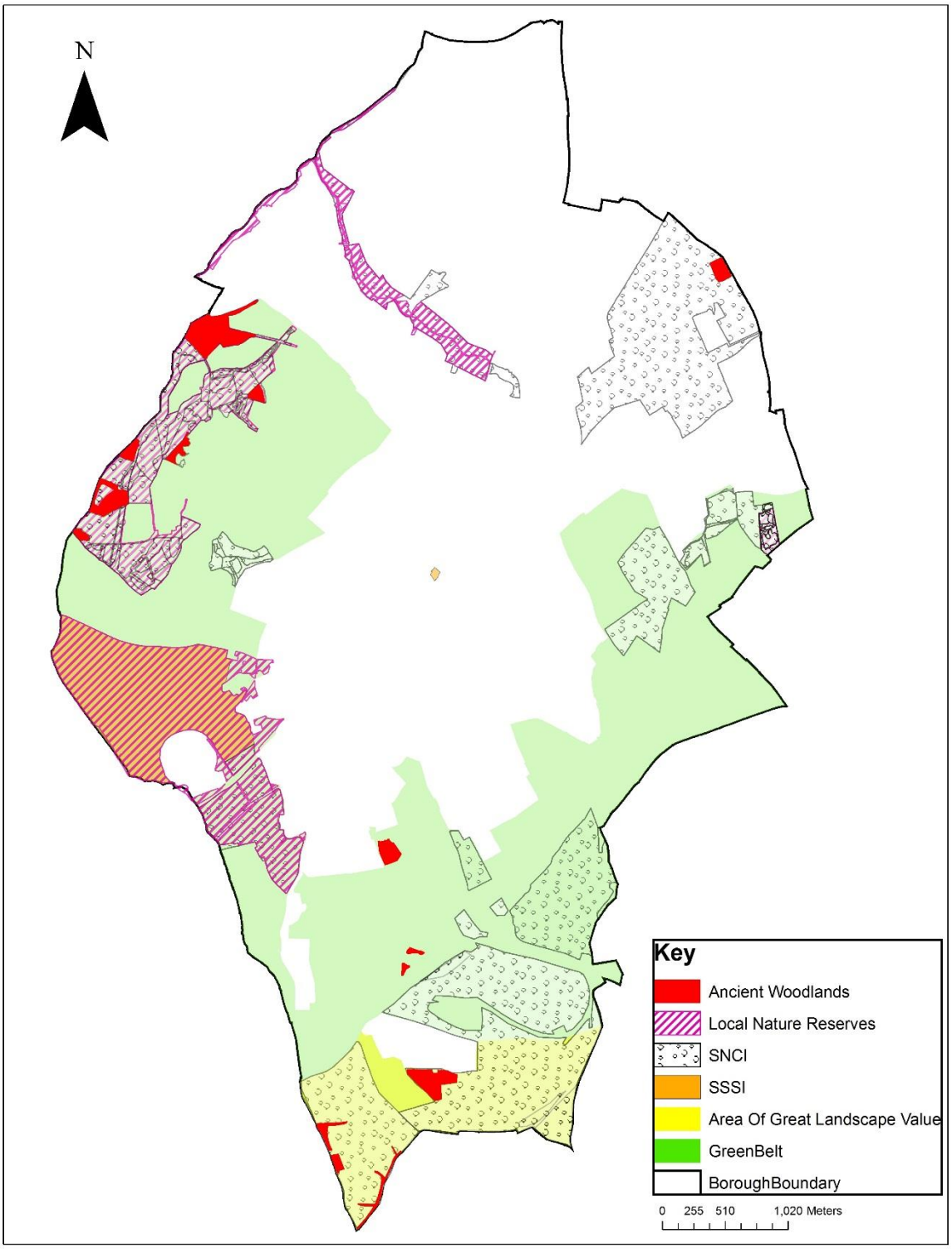
Epsom & Ewell includes Sites of Special Scientific Interest (SSSI), a national level statutory habitat designation[12] A Site of Special Scientific Interest (SSSI) is an area of land given statutory protection by virtue of its examples of the UK's best fauna, flora, geological or physiographical / geomorphological features. They often underpin other national and international nature conservation designations. There are two SSSIs within Epsom & Ewell totalling 176ha in 2019/20. Their condition is monitored by Epsom & Ewell Borough Council.

Epsom Common **SSSI** lies to the west of Epsom Town Centre and is Surrey's largest local nature reserve. The site is designated (1955) for breeding bird habitat and invertebrates associated with decaying wood. The other half of the SSSI is Ashtead Common National Nature Reserve, located in Mole Valley and which is owned and managed by the City of London.

Stones Road **SSSI** lies to the north of Epsom Town Centre. The site is very small (<1ha) and is part owned by both Surrey Country Council and Epsom & Ewell Borough Council. The site is designated for a population of Great Crested Newts that make use of the large and deep pond associated with former brick works. .

[12] Designated under the *Wildlife and Countryside Act 1981*, as amended by the *Countryside and Rights of Way Act 2000*.

Map 1: Sites designated for their biodiversity and landscape value in Epsom & Ewell



Sites designated for their biodiversity and landscape value in Epsom & Ewell

4.2 Local Habitat Sites

Areas of importance for wildlife in Epsom & Ewell.

Local Nature Reserves (LNRs)

LNRs are statutory designated areas for managed nature conservation, and provide opportunities for research and education and for the public to have contact with nature. LNRs are declared by local authorities after consultation with the relevant statutory nature conservation agency. There are currently three LNR in Epsom & Ewell: Epsom Common LNR, Horton Country Park LNR and Hogsmill LNR (See Map 1).

Epsom Common is the largest LNR in Surrey and the Borough's three LNR's total 313ha or approx. 9% of Epsom & Ewell. All three reserves have current management plans that take a one hundred year approach and are agreed Council policy documents.

Local Sites (LS)

Local Sites are non-statutory designations for species and habitats considered to be valuable at a county level; these are also known as 'Sites of Nature Conservation Importance' in Surrey.(SNCI). In 2017 there were 761 SNCI in Surrey of which 13 are in Epsom & Ewell (See Map 1) Local Sites were identified in the 'Lawton Report', a major independent review, as being vital components in England's ecological network that help to conserve important and distinctive habitats and species on sites that fall outside of European or national conservation designations. SNCIs can also:

- Act as stepping stones for species to move across landscapes
- Offer protection for species from surrounding land uses
- Provide sanctuaries for people to experience nature locally.

A list of the sites and their features of value are set out in Appendix 3.

SNCIs have their origin in the 1975 Surrey Structure Plan and since then a system of identification, selection and recommendation for protection in the planning system has been in place, initially under the remit of the Surrey Nature Conservation Liaison Group (SNCLG). Following the recommendations of the DEFRA guidance this body was renamed in 2010 as the Surrey Local Sites Partnership (SLSP). Surveys are carried out periodically and may identify potential new SNCIs or amend existing SNCIs. If the site is found to meet the criteria for selection, the landowner is notified by SLSP and the site is recommended to the Council for designation.

As these local sites are not statutorily protected, their designation within the Epsom & Ewell Local Plan is important for their protection.

Since 2009 the management of Local Sites has been made accountable as National Indicator 197, now termed Single Data List 160-00. This records the number of sites 'in positive management' and in consequence, a general awareness of the importance of these sites has been raised. In 2017 49% of Surrey's SNCI were in positive management, in Epsom & Ewell the figure was 77%.

4.3 Priority Habitats and Species

Habitats and species of principle importance for the purpose of conserving biodiversity in England are listed in the *Natural Environment and Rural Communities Act 2006, Section 41*.

A variety of flora and fauna are found in the borough's ancient woodland, wildflower meadows, heathlands, chalk downland and river valleys. Out of the priority habitats for Surrey, 58 types are found in Epsom & Ewell, including grasslands, woodland, wood pasture, hedgerows and wetlands.

Table 3 sets out the specific types and quantities of priority habitat in Epsom & Ewell.

Table 3: Priority habitats in Epsom & Ewell (EEBC, as of September 2019)

Priority habitat	**Extent (ha)**
Grasslands	
Lowland Calcareous Grassland	**55**
Lowland Dry Acid Grassland	**7**
Lowland Meadows	**20**
Woodland, wood-pasture and parkland	
Lowland Mixed Deciduous Woodland	**8**
Wet Woodland	**1**
Wood Pasture and Parkland	**10**
Arable, orchards and hedgerows	
Hedgerows	**66 (km)**
Wetlands	
Reedbeds	**21**
Total:	**122 (+66km of hedgerow)**

In 2016 the latest national 'State of Nature' report compiled by over fifty UK conservation organisations was published with its key findings as follows:

- 56% of UK wildlife species have shown a declining population trend between 1970 and 2013;
- 15% of all UK wildlife is either threatened with extinction (IE Red Listed - 13%), or is extinct already (2%);
- The UK Priority Species Indicator shows a post-1970 declining population trend index of 67% across the tranche of species with priority conservation status;
- The report has introduced a new index of global 'Biodiversity Intactness' to attempt to measure the planet's descent from its notional pristine natural state. In this the UK compares very badly in the international league table included in the study.

In 2017 the Surrey Nature Partnership published its 'State of Surrey's Nature' report. The report is intended to provide a current stock-take of the county's biodiversity, to include as many of its wildlife species and their habitats as possible. The overall aim was to quantify what has been lost in recent history and what remains most threatened, to help clarify where responsibilities to national and international biodiversity conservation lie and serving to further prioritise conservation efforts at the county level.

The overall results indicated that in Surrey of the entire species sample of 4,242 species 11.5%, or slightly below 1 in 9 of species native to the county are now locally extinct This worse than the national 2% concluded by State of Nature 2016. 4.4% of species are threatened with extinction as decided by IUCN3 Red List criteria, while a further 2.8% narrowly miss these and qualify as near-threatened in Surrey. A further 13.8% of species are over a perceived threshold of rarity in the county with demonstrable evidence to show their historic and/or continuing decline. Only 3.1% are of comparable rarity but in contrast appear to be increasing; 15.2% comprise those Species of Conservation Concern that for now at least appear stable. Just under half of the sample consists of species that are not of conservation concern for us at the present time indicating that an overall 23.7% of extant species are in some degree of trouble in Surrey.

In Epsom & Ewell it is likely that the current situation is similar to the rest of the county and therefore highlighting the need to conserve and improve the management the Borough's green infrastructure at every opportunity.

4.4 Biodiversity Opportunity Areas

'Biodiversity Opportunity Areas' (BOAs) contain the major concentrations of Priority Habitat in Surrey together with identified areas with potential for habitat expansion and re- connection where resources can be focused to have the greatest positive impact for wildlife. The BOAs have been produced by the Surrey Biodiversity Information Centre (SBIC) and are identified to a common standard across the south-east of England. They are compiled using data gathered from various sources including local environmental records centres, local historic, habitat and geological maps and through significant consultation with stakeholders. They are not a statutory designation.

There are presently 50 BOAs, covering 39% of Surrey. However that land within the other 61% can also have significant biodiversity interest as BOAs do not include the entire Priority habitat audit within the county. A small number of statutory protected sites fall outside of the network. Where appropriate the Surrey BOAs link with those identified in neighbouring counties, but currently end at the outer edge of strongly urbanised land-uses. Ecological connectivity cannot be achieved if urban areas are permanently exempted from the network and Green Infrastructure strategies (see next) can play a significant role in establishing and maintaining wildlife corridors.

Section 1.3 of the 2015 Surrey Nature Partnership *Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network,* states "The policy approach to BOAs emerging through a growing number of Local Plans is to avoid, on principle, development that would compromise achieving the overarching purpose and specific objectives of a BOA. This clearly involves protecting the designated and Priority habitats and species in the BOA, but consideration should also be given to whether development will affect existing or potentially improved habitat connectivity, both across and beyond it. It is important to note however, that this does not preclude all development within a BOA; these are primarily spatial planning tools to focus and realise opportunities, not offer further superfluous constraint. As with any eligible development, proposals within or adjacent to a BOA would be required to deliver biodiversity enhancements, but within a BOA such enhancements will be most effective when they are tailored to meet the stated objectives of that BOA. As ever, the scale of enhancements should

be guided by the size and impact of the development; their achievability must be assured and they may also draw on the multiplier metrics currently being piloted to guide Biodiversity Offsetting.

Examples of measures that might be involved include:

- Restoration or maintenance of Priority habitats through suitable management secured by planning obligations;
- Priority habitat creation projects linking fragmented habitats;
- Funding towards conservation initiatives ongoing within the BOA, secured by planning conditions and obligations; and
- Provision of capital items needed to secure biodiversity enhancements (such as fencing to allow grazing).

When a development could potentially impact, either positively or negatively, on the known biodiversity interest of a BOA, a biodiversity survey and report should always be required from applicants, to identify both constraints and opportunities. In some circumstances an Environmental Impact Assessment may be needed.

There is obvious commonality around the aspiration for enhancing habitat connectivity within and between BOAs with that for the successful function of **Green Infrastructure** as a network of inter-connected green spaces. Indeed one of the stated outcomes of well-planned, multi-functional Green Infrastructure is to improve habitat connectivity for biodiversity. Depending on decisions appropriate to their individual character, local authorities may decide to incorporate this aspect of biodiversity conservation policy within their strategy for planning Green Infrastructure. If so, it will remain important to reference the methodology and justification underlying BOAs and to cross-refer their existence in a clear and consistent manner. In depth guidance on the synergies of planning for Green Infrastructure and biodiversity is published by the TCPA/Wildlife Trusts.

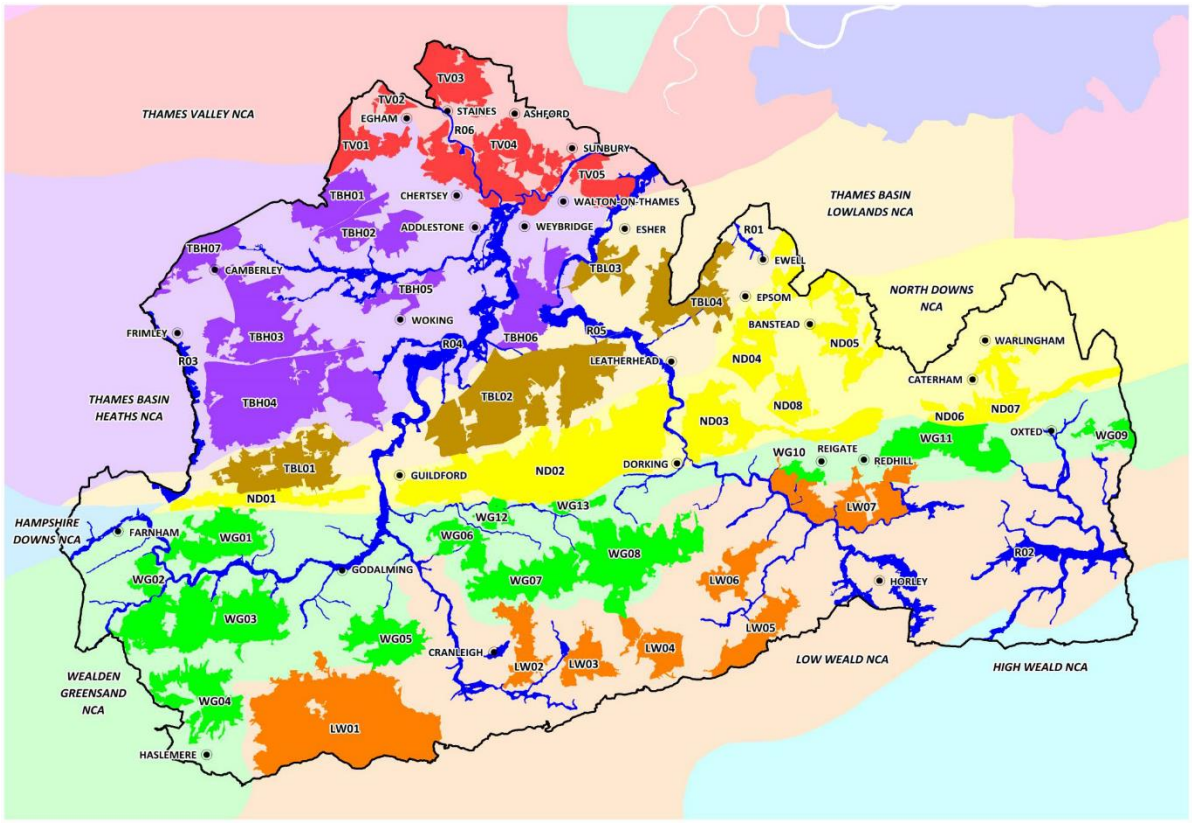
BOA in Epsom and Ewell

Parts of Epsom & Ewell fall within three separate BOA, these are:

ND04	North Downs; Epsom Downs & Nonsuch Park	Epsom & Ewell	Eastern Green corridor Cheam-Epsom Downs	Opportunities to enhance corridor linking Nonsuch Park, Howell & Priest Hill to Epsom Downs & wider countryside.
			Epsom Downs	Priority habitat restoration on racecourse & Juniper Hill (Small blue recovery project relevant)
			Langley Vale Farm (Woodland Trust)	Calcareous grassland/Native woodland/Arable margin creation opportunities.
R01	Hogsmill River	Epsom & Ewell	Epsom & Ewell High School/private & public authority	Opportunities for wetland creation/riparian enhancements throughout river corridor & cross-border into GL
TBL04 (& ND04)	Ashtead & Epsom Commons Woodland, Prince's Coverts & Horton Country Park; Epsom Downs to Nonsuch Park	Epsom & Ewell	Woodcote Stud Farm	Priority habitat restoration to link TBL04 to ND04 (Calcareous grassland, Hedgerows)
		Mole Valley	Farmland centred on Chace Stud. Variety of ownerships - MVDC/Merton College etc.	Corridor linking separate BOAs, includes proposed development sites. Potential for Priority habitat creation
		M25 corridor	Highways Agency	Green bridge over M25 at Teazle Wood

Source: Surrey Nature Partnership Biodiversity Opportunity Areas: *the basis for realising Surrey's ecological network 2015*

Map 2: Surrey Biodiversity Opportunity Areas

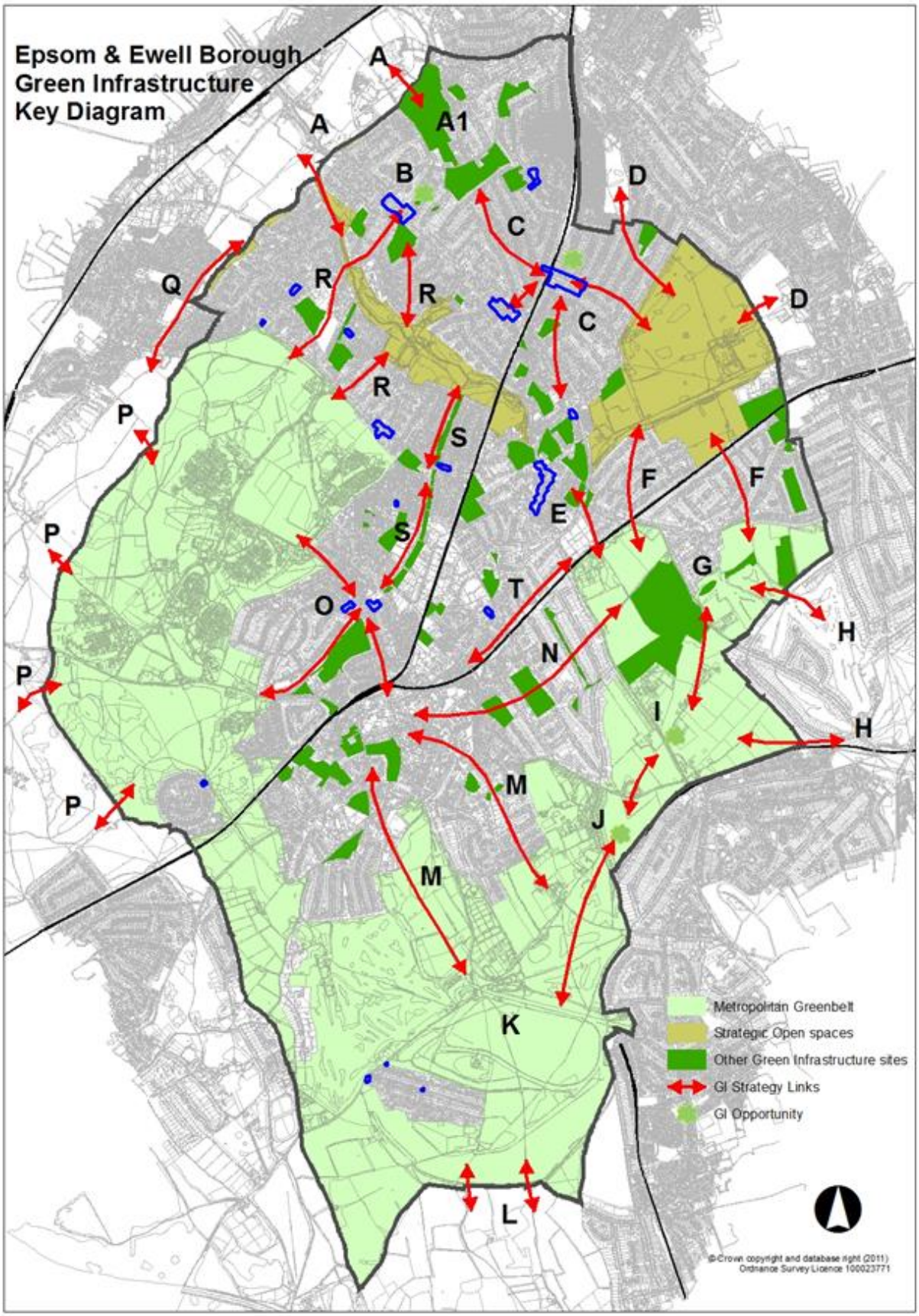


4.5 Green Infrastructure

A 'Green Infrastructure network' is considered to be multi-functional, offering benefits not only to biodiversity but to public realm, health and quality of life. 'Green infrastructure' is an important part of Epsom & Ewell's capital. It consists of a network of green spaces such as parks, open spaces, playing fields and woodlands as well as street trees, allotments, private gardens, water bodies and features such as green roofs and walls.

A well-developed and managed green infrastructure network helps to improve biodiversity by providing spaces for flora and fauna to thrive and by boosting ecological connectivity and permeability. In turn this reduces the impacts of habitat fragmentation, allowing species to move between areas and helping populations to maintain their genetic diversity and adapt to the changing climate.

Green infrastructure in Epsom & Ewell is connected by potential 'green corridors'. These green corridors serve to strengthen the existing GI network and allow species to move between areas, as well as potentially facilitating sustainable travel routes through the Borough. A draft map of potential green corridors in Epsom & Ewell is shown in Map 3 below.



Map 3 Potential Green Corridors In Epsom & Ewell

4.6 Epsom & Ewell's Ecological Assets- Actions for the Local Plan:

1. Identify the following local networks as the Epsom & Ewell ecological network' for protection in the new Local Plan:

    a. **International, national and locally designated sites of importance for biodiversity:**
    Epsom & Ashtead Commons SSSI, Stones Road SSSIAll Local Nature Reserves, Sites of Nature Conservation importance and 'Ancient Woodland' within Epsom & Ewell.
    b. **Surrey Biodiversity Opportunity Areas within Epsom & Ewell**
    c. **Habitat buffer zones, wildlife corridors and the stepping stones that connect them**
    d. **The draft Epsom & Ewell GI network**
    The GI network will incorporate areas including veteran trees, important hedgerows, watercourses and designated local green spaces.

2. Require development proposals to provide information on the ecological value of all sites (not just those listed above) to ensure decline is not simply shifted to other areas or species.

3. Recognise that the 'Epsom & Ewell ecological network' forms part of wider ecological networks across Surrey and neighbouring London Boroughs, and require proposals to consider the potential impacts beyond the Epsom & Ewell area as appropriate.

5 Minimising Impacts on Biodiversity

The national planning policy framework states that planning policies and decisions should enhance the natural environment by minimising impacts on biodiversity[13]. This section details a number of current and emerging strategies that seek to address, mitigate or monitor the wider factors that can lead to biodiversity losses.

Increasing levels of development and urbanisation can indirectly have a range of impacts upon biodiversity through, for example, recreational disturbance, changes to water and air quality, climate change and the 'urban heat island effect' and through green space and biodiversity network losses. Coastal defence works, needed to protect planned and existing homes, businesses and infrastructure can also impact upon the extent of coastal habitats.

5.1 Recreational Disturbance

Wildlife can be disturbed by additional dwellings or intensified uses of land close to their associated habitats arising from additional recreational visits, dog walking, sports, fishing and other activities. Recent examples in Epsom & Ewell have included the need for significant repairs to the crest of a dam, where erosion caused owners persistently allowing their dogs to enter a pond was putting the safety of the dam at risk. This was despite the pond being in a nature reserve. Other smaller ponds have also had to have fences installed to protect wildlife. Publically accessible ‘Ancient Woodland’ on one of our nature reserves is showing signs of strain, with the spring time show of Bluebells retreating away from path edges due to disturbance. Ground nesting birds such as Skylarks have disappeared from a former farm that is now owned and managed as publically accessible open space.

5.2 Water Quality

It is important that future development does not have a negative impact on the water quality of the catchment. This is particularly the case around the Hogsmill and Bonesgate Rivers and applies both during the construction phase and after.

The River Basin Management Plan Thames River Basin District River Basin Management Plan (2015) focuses on the protection, improvement and sustainable use of the water environment. The Plan (which is renewed every 6 years) describes the river basin district, the pressures that the water environment faces and proposed actions. The environmental objectives of the Water Framework Directive (WFD) are:

- to prevent deterioration of the status of surface waters and groundwater;
- to achieve objectives and standards for protected areas;
- to aim to achieve good status for all water bodies or, for heavily modified water bodies and artificial water bodies, good ecological potential and good surface water chemical status;
- to reverse any significant and sustained upward trends in pollutant concentrations in groundwater;
- the cessation of discharges, emissions and loses of priority hazardous substances into surface waters;
- progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants.

[13] MHCLG (July 2018) National Planning Policy Framework, para 170 (d).

Section 3.4 of the River Basin Management Plan sets out a series of actions for local government in order to achieve the objectives.

5.3 Air Quality

Further intensification of residential uses within the urban area is considered likely to initially contribute towards a decline in air quality and an increase in noise and light pollution. However, it is assumed as the local plan period moves forward and new development brings modern and efficient construction techniques, and residents begin to lead more sustainable lifestyles – specifically in relation to travel and energy usage – that there will be a shift in terms of impacts.

Air Quality and Biodiversity - Actions for the Local Plan:

1. Take account of any emerging evidence on air pollution and the impacts on habitat sites from the HRA of the Local Plan and other sources.
2. Highlight air quality concerns as key issue for the Council's HRA and Sustainability Appraisal.

5.4 Climate Change

During July 2019 the Borough Council made a commitment to respond to the tackle the adverse impacts of climate change; particularly in respect of reducing carbon emissions. In response the Borough Council is preparing an Action Plan that sets a target that all of the Council's operations will be net carbon neutral by 2035. The scale of growth anticipated through the Local Plan will have an impact on climate change – specifically through the construction and use of new development and the future travel requirements and patterns of residents and visitors. The Action Plan includes objectives that will be achieved through the Local Plan.

Climate Change – Actions for the Local Plan:

1. Develop and deliver a Local Plan and associated policies that contribute positively and demonstrate the Council's commitment to climate change.
2. Through the Local Plan process identify potential locations and developers to build the borough's carbon neutral homes.
3. Devise opportunities to shift away from reliance on cars to travel in the borough.
4. Increase walking as an alternative to car use.
5. Increase number of safe cycle routes throughout the borough.
6. Enable more people to switch from car to bus travel.

6 Delivering Net Gains in Biodiversity

In-line with national policy[14], planning policies and decisions should provide measurable net gains in biodiversity. Biodiversity net gain is an approach to development that aims to leave the natural environment 'in a measurably better state than beforehand'.

The government published a consultation paper in December 2018[15] which seeks views on whether mandatory requirements should be introduced to the planning system in England so

[14] MHCLG (July 2018) National Planning Policy Framework, para 170 (d).
[15] DEFRA (December 2018) Net gain consultation proposals

that development must deliver biodiversity net gain. Net gain would be quantified through a standardised approach using the "DEFRA metric" system[16], which assesses (and quantifies) levels of biodiversity with the aim of providing certainty and clarify for developers whilst delivering benefits to biodiversity. Applicants should follow the 'mitigation hierarchy' approach as per current national planning policy, which prioritises options that avoid harm to biodiversity, followed by mitigation measures, then compensation as a last resort. If the developer is unable to provide net gains or avoid, mitigate or compensate on-site, a tariff rate would be used to fund other habitat creation projects in-line with other local or national conservation priorities.

The Council will explore the necessary interventions and actions required to achieve biodiversity net gains in development proposals. Below are examples of how biodiversity net gains could be achieved through development proposals.

Biodiversity Net Gain Examples: Green Infrastructure

The Local Plan's background paper on Green Infrastructure (GI) considers green and blue[17] infrastructure to be an integral consideration in the design of new proposals, and for GI features to be multi-functional as possible including the capability to achieve a net gain in biodiversity, amongst a range of other benefits. The background paper identifies potential green corridors which could be strengthened and how development proposals could demonstrate how they will contribute towards these green corridors, which again could include net gain in biodiversity.

Achieving Net Gains in Biodiversity - Actions for the Local Plan:

1. Require all development proposals to seek net gains in biodiversity (include this as a component of the Strategic Viability Assessment).
2. Include outline advice on achieving net gains in development proposals in the Local Plan, based on a knowledge of the local ecological networks and include reference to examples.
3. Advise that the Council's approach to biodiversity will be supplemented by further advice in an SPD at a later date.

7 Appraisal of the Local Plan

Potential impacts upon biodiversity as well as opportunities for biodiversity net gains, arising from the new Local Plan proposals will be considered and assessed under the following:

Habitat Regulations Assessment (HRA)

The Issues and Options consultation was accompanied by a Stage 1 Habitats Regulations Assessment (HRA) screening report (October 2017). It considered whether the options put forward in the 2017 Issues and Options document would have a likely significant effect on any of the protected sites.

[16] Natural England (November 2018) Defra Biodiversity Metric - Introduction to the Proposed Updated Metric (BD2020-10) available from: http://publications.naturalengland.org.uk/publication/6020204538888819

[17] Blue infrastructure can include natural or semi-natural assets such as watercourses, pools, ponds, flood mitigation basins and reed beds.

HRA screening concluded that the four strategic options set out in the consultation paper have the potential to result in significant effects on the protected sites. An additional screening report for the subsequent Regulation 18 stage consultation, which lists potential site options had similar findings. These will be explored further through the stage 2 of the HRA process, which will be carried out alongside the development of the Local Plan.

We will ensure Habitats Regulations Assessment and Sustainability Appraisal are fully integrated into plan-making, including the consideration of strategic projects, and informs the development of the Local Plan at all stages.

Sustainability Appraisal

As a required by legislation, the Local Plan will to be subject to Sustainability Appraisal (SA) and where relevant, must meet the requirements of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC.

An essential consideration when drawing up planning documents is their effect on the environment and people's quality of life, both now and in the future.

The aim of SA is to set out how sustainable development will be achieved through better integration of economic, environmental and social considerations into the preparation and adoption of Local Plan documents. To be effective, a SA must be fully integrated into the plan making process. The SA will be applied at each stage of document production and audit key decisions. SA will be used to monitor the effectiveness of the plan during its implementation in order to inform revisions of the plan that will be more conducive to achieving sustainable development.

An Appraisal must be conducted in line with Government guidance, 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' (ODPM, 2005). While there have been changes to national planning policy, namely the introduction of the National Planning Policy Framework, this guidance is still considered relevant as it incorporates the European Directive[18] requirements for Strategic Environmental Assessment.

A Sustainability Appraisal (SA) will assess the extent to which the emerging Local Plan will help to achieve key environmental, economic and social objectives for the Borough. The SA Scoping Report sets the 'baseline' evidence on sustainability topics and provides a framework for the appraisal.

Health and Well Being

The impacts of planning on health and well-being are wide ranging. The emerging new Local Plan will take full account of health and well-being across the Borough and consider the key themes for the Local Plan in terms of healthy housing, transport and accessibility, healthy Environments (including biodiversity) and social infrastructure.

[18] Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment

8 Proposed actions for new Local Plan

This paper has identified a range of actions to be followed as part of bringing forward the new Local Plan. Together, these approaches are considered necessary to ensure that biodiversity implications, threats and opportunities offered by the new Local Plan are addressed in a comprehensive manner.

The Council will continue to collaborate, consult and engage with key consultees and local partnerships to ensure a comprehensive approach to strategic planning for biodiversity in Epsom and Ewell.

The key actions from this background paper are as follows:

Epsom and Ewell Ecological Assets

1. Identify (or confirm) the following local networks as the 'Epsom and Ewell ecological network' for protection in the new Local Plan:

    a. International, national and locally designated sites of importance for biodiversity;

    b. Surrey Priority Habitat and Species (and their habitats);

    c. Habitat buffer zones, wildlife corridors and the stepping stones that connect them.

Recreational Disturbance

2. Measures should be proposed to ensure sites of biodiversity significance are protected from excessive disturbance that could lead to more erosion or pollution that is acceptable.

Water Quality

3. Acknowledge the water quality issues and gaps in the evidence base in the Local Plan, and that it will be necessary to respond to emerging evidence to determine whether housing in the later stages of the plan period would require appropriate mitigation
4. Pursue higher water efficiency standards in the new Local Plan in order to be consistent with other local authorities in the sub-region and to recognise the water stress issue in the south-east of England.

Air Quality

5. Take account of any emerging evidence on air pollution and the impacts on habitat sites from the HRA of the Local Plan and other sources.
6. Highlight air quality concerns as key issue for the Council's HRA and Sustainability Appraisal.

Achieving Net Gains in Biodiversity

7. Include outline advice on achieving net gains in development proposals in the Local Plan, based on a knowledge of the local ecological networks and include reference to examples.

8. Advise that the Council's approach to biodiversity will be expanded through further guidance at a later date.

Appraisal of the Local Plan

9. Ensure Habitats Regulations Assessment and Sustainability Appraisal are fully integrated into plan-making, including the consideration of strategic projects, and informs the development of the Local Plan at all stages.

Appendix 1: Glossary

Appropriate Assessment: An assessment required by the habitats Directive to determine whether a plan or project is likely to have a significant impact on a Natura 2000 site.

Assemblage Species: A species assemblage is a number of characteristic species which together form the feature and usually share similar ecological or habitat requirements

Ecosystem: A dynamic functional unit consisting of all plants and animals (biodiversity) in an area, together with the non-living, physical components of the environment (water, soil and air) with which they interact.

Ecological Network: An ecological network is a group of habitat patches that species can move easily between.

Ecosystem services: Services provided by the natural environment which benefit people.

Eutrophication: when a body of water becomes overly enriched with minerals and nutrients which induces ab excessive growth of plants and algae. This process may result in oxygen depletion of the water body.

Fauna: The animals of a particular region, habitat, or geological period.

Flora: the plants of a particular region, habitat, or geological period**.**

Habitat Site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

Imperative reasons of over-riding public interest (IROPI): Having established there are no feasible alternative solutions, the competent authority must be able to identify “imperative reasons of overriding public interest” (IROPI) that justify the plan or project despite the environmental damage it will cause. The type of IROPI that a competent authority can consider will depend on the nature of the site that will be affected.

Local Nature Reserve (LNR): A site designated for local wildlife importance and protected under local authority local plans. The designation is agreed by the Local Sites committee.

Macroalgae: Large algae, often living attached in dense beds.

Mitigation: the preservation, enhancement, restoration or creation of a habitat conservation area which offsets, or compensates for, expected adverse impacts to habitat due to land development activities or other projects.

Natura 2000: *Natura 2000* is a network of core breeding and resting sites for rare and threatened species, and some rare natural habitat types which are protected in their own right. It stretches across all 28 EU countries, both on land and at sea. The aim of the network is to ensure the long-term survival of Europe's most valuable and threatened species and habitats, listed under both the Birds Directive and the Habitats Directive.

Natural Capital: The sum of our ecosystems, species, freshwater, land, soils, minerals, our air and our seas. These are all elements of nature that either directly or indirectly bring value to people and the country. *HM Government (Jan 2018) A Green Future: Our 25 Year Plan to Improve the Environment.*

Off-Setting: Biodiversity offsets are conservation activities that are designed to give biodiversity benefits to compensate for losses - ensuring that when a development damages nature (and this damage cannot be avoided or mitigated) new nature sites will be created. Where appropriate, biodiversity offsetting is an option available to developers to fulfil their obligations under the planning system's mitigation hierarchy.

Precautionary Principle: The precautionary principle is designed to assist with decision-making under uncertainty and is a core principle of EU environmental law, enshrined in Article 191(2) of the Treaty on the Functioning of the EU. ***"****Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation"* (1992 Rio Declaration on Environment and Development) or 'better safe than sorry'.

Ramsar sites: These are wetland sites designated as being of international importance, especially those providing waterfowl habitat, under the Ramsar Convention.

Sites of Nature Conservation Importance (SNCI): Sites of Nature Conservation Importance (SNCIs), often termed Local Wildlife Sites elsewhere, form the cornerstone for biodiversity protection in the county. Surrey's SNCIs protect those sites of county, regional or national importance for wildlife that are not covered by these statutory designation.

Sites of Special Scientific Interest (SSSI): an area of land given statutory protection by virtue of its examples of the UK's best fauna, flora, geological or physiographical / geomorphological features.

Appendix 2: Epsom and Ewell Sites of Nature Conservation Importance (SNCI)

Name of site	Area	Grid Ref	Parish	Reason for selection
Downs Covered Reservoir	1.3 ha		Epsom	Chalk grassland, butterflies
Epsom Cemetery	8.5 ha	TQ215593	Epsom	Presence of calcareous grassland
Epsom Common South	50 ha	TQ195595	Epsom	Acidic grassland, species rich grassland, butterflies, veteran trees
Epsom Downs,	177 ha	TQ218582	Epsom	Presence of calcareous grassland, butterflies, Ancient Woodland
Epsom Downs Golf Course	56 ha	TQ222589	Epsom	Presence of calcareous grassland, Butterflies
Hogsmill Local Nature Reserve	38 ha	TQ210635	Epsom	Access to nature, Chalk Stream, Birds, Veteran Trees
Horton Country Park LNR,	100 ha	TQ191617	Epsom	Species rich grassland, amphibian interest, butterflies, ancient woodland
Howell Hill	4.7 ha	TQ239619	Epsom	Species rich grassland, Butterflies
Langley Bottom Farm	113 ha		Epsom	Arable plants, birds

Livingstone Park	9.7 ha	TQ196617	Epsom	Access to nature , veteran trees
Nonsuch park and Warren Farm	149 ha	TQ230635	Epsom	Species rich grassland, Reptiles, Butterflies, Ancient Woodland
Northey Fields	16 ha	TQ223621	Epsom	Arable plants
Priest's Hill	35 ha	TQ230614	Epsom	Species rich grassland, butterflies, access to nature

Appendix 3: Species recorded in Epsom and Ewell protected under the Natural Environment and Rural Communities Act, European Habitat Regulations and Wildlife and Countryside Act.

Species	Group	Status
Common Toad	Amphibian	×
Great Crested Newt	Amphibian	×
Brown Long-eared Bat	Bat	×
Noctule Bat	Bat	×
Daubenton's Bat	Bat	×
Serotine	Bat	×
Leisler's Bat / Lesser Noctule Bat	Bat	×
Nathusius pipistrelle	Bat	×
Common Pipistrelle	Bat	×
Whiskered bat	Bat	×
Natterer's Bat	Bat	×
Soprano Pipistrelle	Bat	×
Red-shanked carder bee	Bee	×
Mellet's downy-back	Beetle	×
Bull finch	Bird	×
Cuckoo	Bird	×
Curlew	Bird	×
Dunnock	Bird	×
Grasshopper Warbler	Bird	×
Grey Partridge	bird	×
Herring Gull	Bird	×
House Sparrow	Bird	×
Lapwing	Bird	×
Lesser Redpoll	Bird	×
Lesser spotted woodpecker	Bird	×
Linnet	Bird	×
Reed Bunting	Bird	×
Sky lark	Bird	×
Song thrush	Bird	×
Spotted Flycatcher	Bird	×
Starling	Bird	×
Tree Pipit	Bird	×
Turtle Dove	Bird	×
Wood Warbler	Bird	×
Yellowhammer	Bird	×

Key	
X	2010-19
X	1990-2009
X	records from Surrey biodiversity in planning report
ex	extinct

Brown Hairstreak	Butterfly	×
Dingy skipper	Butterfly	×
Grizzled skipper	Butterfly	×
Small Blue	Butterfly	×
Small Heath	Butterfly	×
White Admiral	Butterfly	×
White-letter Hairstreak	Butterfly	×
Altantic Eel	Fish	×
Hornet robberfly	Fly	×
Phantom hoverfly	Fly	×
Phoenix fly	Fly	×
Bearded tooth	Fungi	×
Oak polypore	Fungi	×
Orchard tooth	Fungi	×
Zoned rosette	Fungi	×
Stag Beetle	Insect	×
European Water Vole	Mammal	ex
Harvest Mouse	Mammal	×
Hazel Dormouse	Mammal	×
West European Hedgehog	Mammal	×
Autumnal rustic	Moth	×
Beaded chestnut	Moth	×
Blood vein	Moth	×
Brindled beauty	Moth	×
Broom moth	Moth	×
Brown-spot pinion	Moth	×
Buff Ermine	Moth	×
Centre-barred sallow	Moth	×
Cinnabar	Moth	×
Crescent	Moth	×
Dark spinach	Moth	×
Dark-barred twin-spot carpet	Moth	×
Deep-brown dart	Moth	×
Dot Moth	Moth	×
Double dart	Moth	×
Dusky brocade	Moth	×
Dusky thorn	Moth	×
Dusky-lemon sallow	Moth	×
Ear moth	Moth	×
Feathered gothic	Moth	×
Figure of eight	Moth	×
Flounced chestnut	Moth	×
Garden dart	Moth	×
Garden tiger	Moth	×

Green-brindled crescent	Moth	×
Grey Dagger	Moth	×
Heart moth	Moth	×
Hedge rustic	Moth	×
Knot grass	Moth	×
Lackey	Moth	×
Large nutmeg	Moth	×
Latticed heath	Moth	×
Minor shoulder-knot	Moth	×
Mottled rustic	Moth	×
Mouse moth	Moth	×
Oak Hook-tip	Moth	×
Oak lutestring	Moth	×
Powdered quaker	Moth	×
Pretty chalk carpet	Moth	×
Rosy minor	Moth	×
Rosy rustic	Moth	×
Rustic	Moth	×
Sallow	Moth	×
September Thorn	Moth	×
Shaded Broad-Bar	Moth	×
Shoulder-striped wainscot	Moth	×
Small emerald	Moth	×
Small phoenix	Moth	×
Small Square-spot	Moth	×
Spinach	Moth	×
Sprawler	Moth	×
Streak	Moth	×
White Ermine	Moth	×
Basil thyme	Plant	×
Chalk eye-bright	Plant	×
Chamomile	Plant	×
Ground pine	Plant	×
Juniper	Plant	×
Man Orchid	Plant	×
Penny royal	Plant	×
Red Hemp Nettle	Plant	×
White helleborine	Plant	×
Adder	Reptile	×
Common Lizard	Reptile	×
Grass Snake	Reptile	×
Slow-worm	Reptile	×

LOCAL PLAN EVIDENCE BASE: SPATIAL ECONOMIC DEVELOPMENT STRATEGY

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annexe 1: Draft Spatial Economic Development Strategy (January 2020)
Other available papers (not attached):	

Report summary

The Draft Spatial Economic Development Strategy is a technical study commissioned by the Council to inform the emerging new Local Plan on the provision of employment land to meet the economic growth opportunities and options.

The Strategy identifies a number of priority interventions that would assist the borough to achieve longer-term economic prospects. The priority interventions set a strategic direction with projects identified that could come forward as part of separate business cases.

The Strategy identifies supporting measures including polices and development management guidelines.

Recommendation (s)

The Committee notes the contents of the Spatial Economic Development Strategy 2020 as a technical study that will form part of the evidence base for the emerging new Local Plan.

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

1.1 The Spatial Economic Development Strategy will form part of the evidence base for the emerging Local Plan policies. The delivery and implementation of the Epsom & Ewell Borough Local Plan will ensure sustainable growth is planned in the Borough to meet the Corporate Vision, priorities and values.

2 Background

2.1 The Core Strategy 2007 sets out the policies for employment land provision and investment. The Economic Development Plan 2016 builds on this with an emphasis on delivering growth and diversification in the local economy. Being part of the Coast to Capital Strategic Economic Plan (SEP) enables the borough to build a long term vision which strategically aligns to those in the SEP that are relevant to the borough.

3 Proposals

3.1 The Local Plan Spatial Economic Growth Strategy aims to identify solutions for the provision of employment space to meet the borough's needs for economic growth and change within the plan period. It also identifies possible interventions, local plan policy changes and approaches required to deliver those solutions.

3.2 The Strategy identifies priority interventions to strengthen the borough's longer-term economic prospects, these include:

- University Enterprise Zone and Creative Businesses Hub
- Accelerated Redevelopment of the Utilities, East Street sites and Kiln Lane Industrial Estate
- Longmead Office & High-tech Expansion Hub
- Epsom & Ewell Cycle Network

3.3 The Strategy sets out the rationale for these interventions and the steps needed for their implementation, which includes the creation of an Enterprise Zone.

3.4 Supporting measures to achieve the aims include policies and development management guidelines for Epsom Town Centre, Longmead and Nonsuch, Ewell and Stoneleigh and The Downs.

3.5 The Strategy forms part of the evidence base for the new Local Plan, however it importantly sets out what is needed to create the conditions for investment and economic growth. The Strategy sets the direction and detailed business cases will be required for projects.

4 Financial and Manpower Implications

4.1 The Spatial Economic Development Strategy has been prepared within agreed budgets by external consultants Economic Growth Management.

4.2 The planning policy team have undertaken the commissioning and contract management of the project.

4.3 ***Chief Finance Officer's comments:***

5 Legal Implications (including implications for matters relating to equality)

5.1 The Local Plan will be examined to assess that it has followed legal and procedural requirements and that it is 'Sound'. For the Plan to be considered Sound, it needs to meet the following tests:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

5.2 The Spatial Economic Development Strategy will inform the strategies and policies contained within the emerging new Local Plan in order to ensure that they meet the tests of soundness.

5.3 ***Monitoring Officer's comments:*** *None for the purposes of this report.*

6 Sustainability Policy and Community Safety Implications

6.1 The new Local Plan will contribute towards delivering the Council's objectives and priorities.

6.2 Proposed policies are subject to a Sustainability Appraisal which is an integral part of the plan making process.

7 Partnerships

7.1 Local Planning Authorities have a duty to cooperate with public bodies on strategic planning issues that cross administrative boundaries.

7.2 Economic Growth Management have engaged with a wide range of partners and commercial interests in preparing the Spatial Economic Growth Strategy.

8 Risk Assessment

8.1 Insufficient evidence to support the new Local Plan policies may result in the Local Plan not meeting the test of Soundness of being positively prepared, justified, effective and consistent with national policy.

9 Conclusion and Recommendations

9.1 The Committee notes the contents of the Spatial Economic Development Strategy as a technical study that will form part of the evidence base for the emerging new Local Plan and be published on the Council's website.

Ward(s) affected: (All Wards);

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Local Plan Spatial Economic Growth Strategy for Epsom & Ewell Borough

Main Report

Prepared for

Epsom & Ewell Borough Council

By

Economic Growth Management

6th January 2020

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EXECUTIVE SUMMARY

Relevant Issues

Epsom & Ewell faces major challenges in providing the required amount, types and quality of employment space needed to address the patterns of growth and change expected over the coming decades. Opportunities for new development are limited, coupled with the constraints of an urban area surrounded by the Greenbelt.

Nevertheless, opportunities have been identified for providing solutions to current shortages of employment space through proactive and imaginative redevelopment of existing sites and buildings already in employment use.

Key drivers for delivering such solutions stem from the emerging strategic policy environment. The proposed designation of the Epsom and Leatherhead corridor as a Strategic Opportunity Area, being one identified within the Surrey 2050 Place Ambition, sets the scene for proactive development and regeneration.

Complementing this is the prospect of the creation of a University Enterprise Zone which would be a major catalyst for marshalling the creative and entrepreneurial talent being generated by the University of Creative Arts and is expanding its business school towards local economic growth opportunities.

Transforming the employment space offer of the borough in preparation for the substantial changes to the economic structure and operating conditions that can be anticipated over the next 20 years will involve major challenges. However substantial opportunities are available to achieve this through the redevelopment of such locations as the Utilities and adjacent East Street sites and council owned properties at Longmead. In parallel, there is the potential to create a major incubator complex in association with the potential University Enterprise Zone which would provide a major catalyst for the creation and growth of tomorrow's industries.

However, radical solutions to improve accessibility will need to be put in place in parallel with the site redevelopment projects. Given levels of road congestion, alternative solutions such as improved cycling and walking infrastructure and the introduction of new networks and systems for vehicles based on clean technologies will need to be devised in the short and medium term in order to reduce dependence on car usage.

Based on these findings the following recommendations are put forward for consideration as potential projects to enable the economic longer term prosperity of the borough.

Recommendations

1) An early start should be made on taking forward a focused programme of high-profile flagship development projects with the potential to reposition the attractiveness of the borough to high-quality employers with good growth prospects. Redevelopment

projects on the Utilities site, East Street, and at Kiln Lane and Longmead should be accelerated.

2) Epsom & Ewell should get fully prepared for submitting prompt responses to forthcoming funding opportunities from the government and Local Enterprise Partnership through the identification of a portfolio of sites suitable for high impact redevelopment, coupled with appropriate feasibility work, master planning, preparation of development briefs and costed infrastructure and site preparation proposals, outline project programmes and business cases, each prepared in advance.

3) Measures to substantially increase the amount of small business accommodation should be developed. As a priority, it should be directed towards the set-up of an enterprise centre suitable for the creation and growth of creative and technology-based businesses within the area in conjunction with key partners such as UCA and Nescot. Designation as a University Enterprise Zone should be actively pursued. Following on from this, under-utilised buildings with scope for adaptation should be identified and a programme established for adapting them to meet the need for grow on space.

4) The proposed infrastructure for the creation of an exemplary, highly attractive network of cycling and walking routes connecting the employment areas, public transport hubs and nearby residential areas should be planned and implemented as one of the key priorities. An ongoing strategy and proposals for the creation of a zero-emission transport network for other modes should follow on from this initiative.

5) A comprehensive suite of updated planning policies orientated to the needs of growth and change in the borough and to ensuring the highest quality development outcomes should be put in place oriented to the types of opportunities highlighted above.

1. Introduction

1.1 Purpose of this Document

1.1.1 The purpose of the Spatial Economic Development Strategy is to provide guidance to the Local Plan on the provision of employment land necessary to meet the economic growth opportunities and options faced by the Borough. This is distinct from other economic development activities such as inward investment promotion, business support and skills development which, though complementary, would be dealt with through separate workstreams.

1.1.2 The strategy has been prepared by Economic Growth Management to provide:

a) An overview of the challenges for achieving economic growth within the borough
b) The strategic context and emerging ambitions for the future of the borough and wider sub-region
c) Opportunities for securing the future prosperity of the borough
d) Strategic objectives for delivery of the Spatial Economic Development Strategy
e) Priority interventions recommended for bringing forward the key spatial economic growth opportunities
f) Supporting measures to assure longer term balanced and sustainable economic growth.

1.2 Supporting Evidence Base

1.2.1 This strategy document builds on the evidence from the Borough's economic profile and an assessment of economic growth potential, evidence of demand for employment space in Epsom & Ewell, an assessment of current employment land stock and for development of specific sites and locations within the borough. These findings have been consolidated into a single Evidence Base document to support this strategy document.

2. Opportunities and Challenges Facing Epsom & Ewell

2.1 Profile of Future Growth

2.1.1 The revised Local Plan which is currently emerging will need to determine how to balance the supply of employment land and floorspace within Epsom & Ewell to cope with a number of factors and influences arising over the plan period to 2034.

- To the extent that the population of Epsom & Ewell along with the surrounding districts grows over the plan period, demand will intensify for supplies and services to support new or enlarged communities. More jobs will need to be created and accommodated locally from this demand. Higher levels of employment will be needed to sustain the future population more generally.

- In parallel with this, the Borough Council has an ambition to create more jobs locally in order to reduce the volume of commuting up to London and elsewhere.

- A major shift is going on in the structure of employment whereby traditional jobs that are repetitive and codifiable are likely to be replaced by artificial intelligence. Meanwhile, new types of employment involving more specialist types of workers at all levels are projected to emerge.

- Demand from tomorrow's new industries will demand new and different types of working environments, particularly in view of the identified shift towards micro-businesses in local growth sectors such as the digital, creative, high tech and professional and technical services sectors, coupled with the need to provide grow on space and to retain Epsom's large employers. There will be a need to provide highly attractive settings for working and living if tomorrow's more sophisticated workforce is to be attracted to work within the borough.

2.2 Sector Growth Opportunities

2.2.1 Epsom & Ewell faces some exciting opportunities for growth, specifically where it has demonstrated comparatively strong growth performance or has notable competitive advantages.

- Software development
- Growth in the wider high-tech specialised subsectors
- Professional and technical services
- The creative and cultural industries
- Higher and Further education
- High-value inward investment

2.2.2 Other growth can be expected from sectors affecting by the shifts coming about through demography and the impacts of new technologies:

- Services to support an expanding population
- Digital technologies – growth opportunities arising from the forthcoming demands for, artificial intelligence, 5G communications applications and big data
- Clean technologies
- Advanced transportation and related motor trades
- Alternative high value town centre functions and services

2.3 Addressing the Space Requirements for Key Sectors

2.3.1 These factors will increase the requirement for a diverse range of employment space. Taking account of these considerations, a key step is to understand the requirements of the sectors and activities that can be expected to expand which will underly the options for growth in the borough. Accordingly, the table below profiles the types and sizes of employment uses and required operating environments needed to meet future demand from the sectors that are expected to grow.

2.3.2 In the case of offices, it should be noted that reference is made to varying sizes of unit. The following floor areas would apply in each case.

Micro	0 to 499 sqft
Grow on/Intermediate	500 to 1999 sqft
Medium	2000 to 9,999 sqft
Large	10,000 to 24,999 sqft
Very Large	25,000 sqft+

Sector	Space Requirements	Required Operating Environments
Growth Sectors in B Class		
Professional, Scientific & Technical Services	A ready supply of micro, intermediate and medium sized offices.	Within or in close proximity to the town centre and station. Should include increased provision of serviced and short lease accommodation and business centres with shared meeting space and service support for use by home working professionals and start-up companies.
Digital Technologies	High quality micro and grow on offices offered on flexible terms.	As above plus very high capacity broadband.
Creative Industries	Hot desks and community workspaces with meeting areas Lockable office units of 2-400 sqft Designer maker spaces of 2– 600 sqft Some provision for expansion units of 40-100sqm	Low cost buildings within easy reach of the town centre. Heritage and other interesting buildings if and where available. Links to the University of Creative Arts and Nescot.
Other High-Tech Activities and Clean Technologies	Clean, modern quasi office and industrial grow on and medium sized units.	Smart and presentable industrial area with good public transport.

Sector	Space Requirements	Required Operating Environments
Business Administration and Support Services	Mostly micro and intermediate sized offices.	Within or in close proximity to the town centre and station.
Advanced Transportation Infrastructure	Intermediate sized offices for management and operational centres. Medium sized light industrial maintenance depots.	Locations for pick up and storage of electric bikes Charging infrastructure at car parking locations, and work-places Future drop-off & pick up points for electric vehicles Out of town parking depots
Artisan Manufacturing	Intermediate sized light industrial space	Industrial areas
Motor Trades	Large car showrooms units with high quality industrial space for associated maintenance and servicing operations.	Good road accessibility Car storage facilities
Requirements of Non B Class Activities Expanding Due to Population Growth		
Wholesale distribution and trade counters	Small and medium sized industrial and warehouse units with lorry access and parking where necessary.	Attractive industrial areas with good road accessibility and parking.
Food and beverage	Prominent intermediate sized retail units.	Attractive, high visibility retail and high-density residential environments served by good public transport and parking. Heritage buildings where available. Outside seating areas.
Speciality retailing	Small retail units	Streets with characterful frontages and interiors close together Heritage buildings where available. Internal and external spaces for grouping of market stalls for arts, crafts and accessories.
Arts, culture & entertainment venues	Empty retail units suitable for pop up activities. Performing arts spaces with seating – internal and external – and external bandstands Galleries and exhibition spaces	Within or close to town centre. Close to food and beverage outlets with internal and external seating.

2.4 Evidence of Demand

2.4.1 The market for office space is changing. Whereas much of the demand in Epsom 10 years ago came from financial services and related professional firms such as accountants, this appears to have receded. New types of demand have now emerged, particularly small workspace.

<u>Micro Business Units and Grow-on Space</u>

2.4.2 More schemes are needed which can address the trend for flexible working, hot desking and the use of modern technology and provide support for homeworking appear to have replaced traditional demand. Many small businesses, whilst working

flexibly still require a base or hub and are prepared to pay for decent quality and smart, slick office space, which the borough currently lacks.

2.4.3 There was a net increase of 925 businesses in Epsom between 2010 and 2018 equating to an average of 116 per year. These are accounted for principally by the major growth sectors such as information and communication, professional, scientific and technical services and business administration services. The majority of these involve office-related uses. The vast majority of this increase is accounted for by business start-ups and small expansions - of 3725 businesses in Epsom in 2018, 3,155 (85%) have between 0 and 4 employees. This suggests that there is a need to address this demand by providing more office buildings subdivided into smaller units than is currently available.

2.4.4 Local commercial property agents have reported that due to the increase in people working from home or out of coffee shops on an iPad etc, there has been a big change in demand from the small end office market and highlight a need for high quality incubator space. The trend for flexible working looks set to remain, and will probably increase, as more and more businesses use hot-desking, home-working and flexible hours as a way of cutting costs and using technology to its full advantage. Whilst often needing less space as a consequence, businesses still require a base, or a hub of some sort and the requirement is typically for quality over quantity.

2.4.5 This is an area in which intervention is likely to be necessary. The investment market won't provide short leases on new buildings so the only scope for businesses is to provide workspace from existing buildings coming back into the market. A further constraint to converting office buildings into smaller units is that the big spaces are not in tenant control, being owned by landlords. Floor areas available in empty office buildings are large and there is always a reluctance for these to be broken up and offered as short leases for smaller spaces given management costs, the cost of partitioning and less certainty of long-term income.

2.4.6 A comprehensive strategy needs to be developed to amplify the supply of units of this size and the type of environment favoured by creative and high-tech workers – vibrant urban locations with a strong café culture and buzzy environments in which to meet up. Appropriate solutions need to be put in place if Epsom & Ewell is to stay ahead of the game.

2.4.7 Net increases of businesses in all other size bands equated to an average of only 10 businesses per year (Source: UK Business Counts). This suggests that more business expansions could have been achieved if the supply of business accommodation were less constrained. The Coast to Capital LEP Strategic Economic Plan corroborates this view by highlighting the shortage of good quality, flexible, and affordable office, industrial and specialist space as one reason why the area has a higher number of micro businesses than other parts of the South East and lower numbers of scaling and medium size businesses.

2.4.8 Amongst commercial property agents there is felt to be sufficient demand for a new business or industrial park, for start-ups and small businesses of 1-10 people. One local commercial property agent notes a significant number of enquiries for small warehouse space for high-tech uses, comprising storage, distribution and office space, mostly for units of 1-2,000 sq ft.

Medium Sized and Large Business Units

2.4.9 The market for industrial and warehouse units in Longmead and Nonsuch is extremely buoyant with demand outstripping supply, causing upward pressure in rents.

2.4.10 Local commercial property agents have reported that many enquiries come from businesses already in the borough. They occasionally look elsewhere, even outside of the borough, simply out of interest and to see what the options are. However, 70-75% of them stay in the area partly because of the cost of moving and the risk of losing staff and having to re-recruit, and also because they are generally happy in the area, as long as they have appropriate premises and adequate space.

2.4.11 Recent deals have been: Sirus, a cloud-based IT business, who relocated from Richmond and took 3,500-4,000 sq ft of space; Skyguard, a company specialising in lone worker alarms, who relocated from the Tolworth area into the town centre – they needed bigger premises and liked the station and amenities of the town; a Sodexo business specialising in the recruitment of nurses also recently decided to locate here, as did Kantar, a marketing data consultancy and part of WPP.

2.4.12 In the past, a significant number of enquiries came from the insurance and financial services sector, for example accountancy firms attracted to the town by the presence of BDO and Deloitte. However, there are no longer any such noticeable trends, and enquiries now come from a wider range of business sectors. Units of 5,000-15,000 sq ft are much less in demand than before.

2.5 Mismatches in the Supply of Employment Sites and Buildings

2.5.1 Local commercial property agents have reported that there is a current shortage of space across all size ranges. There is an acute shortage of small business units, particularly for businesses with the aspirations and potential for scaling-up.

2.5.2 Throughout the borough, there is a mismatch between the availability, types and sizes of office and industrial space currently on offer and that required by existing businesses and the emerging growth industries. This is primarily because almost all of the existing employment sites are fully occupied; when space does become available this is in high demand. Completions for office stock have been particularly low within Epsom Town Centre since the 1990s. There is a lack of flexibility in unit sizes and lease lengths that are available for units on East Street. There is a need for investment in office stock to provide units which meet current user requirements.

2.5.3 Housing pressures have been creating pressure for change of use of existing office sites, whether through permitted development rights or planning applications for new development, though in recent years, useful work has been undertaken in establishing Article 4 directions for maintaining employment uses on key sites. The surrounding Greenbelt also limits the opportunities for additional employment-related development.

3. Opportunities for Accommodating Growth and Change

3.1 Main Opportunities for Site Redevelopment

3.1.1 Though there are virtually no greenfield sites for development, there is considerable scope for redevelopment of existing sites and buildings to create a substantial increase in employment floorspace.

The Utilities Site

3.1.2 The Utilities site includes a council car park and land formerly used for gas production and distribution. The leisure centre lies to the north of the site. The current aspiration is for a significant mixed use development providing housing for all generations (e.g. student accommodation, retirement housing and residential units for the general market) as well as employment space and a range of supporting amenities to make the scheme self-sufficient, with a high sense of place and an academic and cultural offer.

3.1.3 However, remediation will be expensive as there is considerable contamination such as a former tar pit on which the current car park sits. For this reason, high-value development and possible public sector funding for enabling work on the site may essential if development is to be taken forward.

East Street

3.1.4 East Street is regarded as having potential to become the borough's Central Business District. However, many of the office buildings on the street suffer from outdated internal layouts and are ripe for refurbishment. East Street is also in need of improvement to its public realm.

3.1.5 Amongst the buildings immediately adjacent to the Utilities site that face onto East Street, there are several that have scope for recycling and redevelopment and intensification for employment uses and other complementary activity. This would complement high profile development on the Utilities site and propel this grouping of sites into a significant central business district.

3.1.6 In addition, one or more empty buildings in the street could potentially provide a site for a creative business centre, though it is likely that this would depend on the council acquiring the site in the first instance.

Epsom Town Centre

3.1.7 Within the town centre, there is scope for intensification of some large office sites such as Parkside House which lies behind Epsom Gateway and possibly intensification of the Ashley Centre for office uses above the retail complex. However, this would be dependent on the stronger market conditions for such schemes to be viable, so these

must be regarded as long term prospects. In Church Street there is scope for recycling existing office buildings for intensified office uses together with secondary retail and ancillary uses.

Longmead and Nonsuch Industrial Estates

3.1.8 The Longmead and Nonsuch industrial estates have a strategic importance as an employment location, mainly, though not exclusively for industrial uses and a number of sites on Longmead and Nonsuch have major scope for redevelopment.

3.1.9 The estates need to maintain their role in supporting the local economy and population by retaining such uses as trade counters, distribution centres, motor servicing and small-scale manufacturing facilities. There is scope for intensification of these uses on the existing sites. Due to intense current demand, the industrial units have seen a significant rise in rents in recent years and the high investment returns currently being generated reduce the incentive for redevelopment and intensification in the short to medium term. For this reason, many of the sites will remain as they are for the foreseeable future, but as individual estates and buildings become time expired and reach the end of their economic life, there will be major scope for intensification of the existing uses to provide additional capacity.

3.1.10 However, there is also scope for provision of a complex of grow-on office and clean maker space for technology-based companies that are scaling up and expanding and other office users such as professional and business services companies and regional headquarters operations. Companies such as Photo Me and Tchibo have recently set up headquarters on the estates indicating that such office uses are viable within the industrial estates. This could be achieved through redevelopment or reconfiguration of the council owned land. A substantial amount of new office space could be provided, which would alleviate a major shortage of space for expanding companies within the borough.

3.1.11 Realising these opportunities on the industrial estates to their full potential will depend on achieving more intensive use of the employment land. In this regard the local plan will play a crucial role by enabling more intense uses. However, it would be important to have conditions in place to ensure that the resulting increases in land values translate into architectural and public realm quality.

3.1.12 Success will also hinge on improving accessibility. In recent years, consideration has been given to the building of the Kiln Lane link in order provide seamless access between the Longmead and Nonsuch industrial areas, currently severed by the Epsom mainline railway. However, feasibility work has shown that the value of transport benefits and development gains is insufficient to justify such a scheme going forward in the foreseeable future. Unless high-rise residential development were to be taken forward on adjacent sites, the required criteria for the scheme to go ahead will not been met. Moreover, apart from the cost of constructing the scheme, there would be considerable associated costs to be met such as the buying out of existing businesses

at a relatively high land values. There would also be major disruption and uncertainty caused by the need to displace a number of existing employees. Whilst this may be a possibility in the long term the Kiln Lane is not currently a viable option. In the meantime, alternative solutions, in line with the drive towards reduced car dependency and zero emission targets will need to be introduced in order to provide the required level of accessibility to these areas.

3.2 Strategic Policies and Ambitions

3.2.1 A number of current strategic policies and ambition statements are setting the scene for taking forward these opportunities.

Aims of the Core Strategy

3.2.2 Epsom & Ewell's current Core Strategy 2007 defines a series of principles which underlie the policies adopted for employment land provision to ensure or encourage:

a) availability of sites for a range of sizes, quality and locations in order to meet the range of needs of business
b) the regeneration and intensification of in the strategic employment areas of the Nonsuch and Longmead Industrial Estates, Epsom town centre and Ewell Village centre
c) securing "smart growth" - growth which does not rely on imported labour or require more land - such as more flexible working practices, greater use of technology or homeworking).
d) enhancement of the Borough's economic performance and maintaining a vibrant employment market
e) the reduction of longer distance out commuting by the provision of a range of local jobs.

Economic Development Plan 2016

3.2.3 The Epsom & Ewell Economic Development Plan emphasises delivering growth and diversification of the local economy towards higher value business, locally based employment opportunities, suitable conditions for working locally and the enhancement of the economic and lifestyle roles of the town centre. It proposes a series of priority interventions oriented to spatial development to securing economic growth, including:

a) securing and delivering the enabling infrastructure essential to improving the functionality and competitiveness of the town
b) stimulating employment diversification, business investment and growth
c) widening the choice of commercial property and
d) enhancing the economic and support role of the town and local centres.

Coast to Capital Strategic Economic Plan and Emerging Industrial Strategy

3.2.4 The Coast to Capital LEP Strategic Economic Plan sets out a long-term vision to build facilities to enable the growth of businesses to bring about high-quality local jobs. Their stated spatial development priorities, which are directly relevant to the needs Epsom & Ewell. are to:

- deliver prosperous urban centres, prioritising funding for towns and localities with ambitions for transformational development and economic growth
- develop business infrastructure and support - funding for high quality business space so that productive businesses can flourish
- invest in sustainable growth, promoting strategies for energy, waste, water and low emission vehicles
- promote better transport and mobility, such as through investment in Crossrail 2 whilst bringing further funds to roads and railways across the area.
- improve digital network capability, through investment in a new standard of full fibre broadband connectivity between the economic hubs.

The SEP highlights the shortage of good quality, flexible, and affordable office, industrial and specialist space as one reason why the area has a higher number of micro businesses than other parts of the South East, and lower numbers of scaling and medium size businesses.

Future 40

3.2.5 Future40 is the Borough Council's initiative that seeks to create a new long-term vision for the borough focusing on the type of future that local people want. Future aspirations for the borough are focused on promoting the following themes.

- Green and Vibrant - clean energy, greater use of sustainable transport, reducing the carbon footprint and contributing to improved air quality

- Smart and Connected - connectivity, seen as a top priority including the opportunities from Cross Rail 2, access to including improved walking and cycling routes, better access for the disabled and families and the fastest and best possible digital data infrastructure and easy access to everything on the doorstep

- Safe and Well - improved safety and physical and mental wellbeing, with ready access to great medical and health facilities

- Opportunity and Prosperity - a distinct identity for the borough and a compelling reason to visit, shop, live, study, work and invest in the borough; the required investment in affordable housing and workspaces; higher quality design of

buildings and public spaces to attract more shopping visitors businesses and retailers; and retaining the talent and skills that have been nurtured here

- Cultural and Creative - pride in the borough's rich history and heritage as an important Market Town and a famous Georgian Spa Town and renowned horseracing venue.

Surrey 2050 Place Ambition

3.2.6 The Surrey 2050 Place Ambition provides a shared vision to maximise effectiveness in the delivery of services, private sector investment and government funding opportunities and to deliver efficiencies of scale. Its vision is for a county of well-functioning and connected places, with healthy communities and a high quality of life based on collaborative and innovative solutions to meet the need for new homes, greater economic prosperity and infrastructure improvements. This will be underpinned by three shared strategic priorities that will inform and support targeted delivery at a local level.

1) Improving current connectivity between strategically important hubs - a coherent infrastructure investment strategy which will improve local and strategic connectivity, aimed at unlocking development opportunities, addressing the impacts of climate change and improving the overall health and well-being of residents.

2) Enhancing the "place offer" of Surrey's towns by making sure land is used in the most efficient and versatile way to unlock the potential of Surrey's towns, increase the provision and choice of homes offered, safeguard employment land and premises within town centres close to sustainable modes of transport and ensure a continued and flexible supply of premises to meet changing economic needs.

3) Maximising the potential of the county's strategic economic assets, focusing strategic interventions and transformational projects in eight Strategic Opportunity Areas (SOAs) that can support priority industrial sectors and improvements to connectivity both within and beyond Surrey, within a common framework focused on investment in infrastructure, unlocking strategic sites and improving connectivity between key hubs and along strategic movement corridors. The Epsom to Leatherhead M25 (Junction 9) Corridor is designated as an SOA.

3.3 Support for Unlocking Constraints to Economic Growth and Change

3.3.1 Given the above strategic polices and ambitions, a number of opportunities to fund the bringing about of conditions for the addressing the mismatches and shortages of

employment space necessary to accommodate Epsom & Ewell's growth industries can be expected to come forward.

- Epsom to Leatherhead M25 (Junction 9) Growth Corridor

As mentioned above, the Epsom to Leatherhead Corridor is a defined as one of eight Strategic Opportunity Areas, within which strategic interventions and transformational projects will be focused to support priority industrial sectors and improvements to connectivity over the next 20 years. In order to maximise the potential of the county's strategic economic assets, the Place Ambition seeks to develop infrastructure funding solutions aimed at unlocking development opportunities.

- Proposed designation in Epsom & Ewell of a University Enterprise Zone

The University of Creative Arts in Epsom provides a hub for creative industries, fashion, art, and design, together with specialisms in business and marketing for the sector. University Enterprise Zones are specific geographical areas where universities and business work together to increase local growth and innovation. Working with the Local Enterprise Partnerships, the aim is to stimulate development of incubator or 'grow-on' space for small businesses in locations that encourage businesses to interact with universities and to innovate. The zones would have access to business support packages and the specialist facilities and expert knowledge offered by universities.

To take forward to the UEZ concept, it will be necessary to provide a site or buildings on which to take forward a suitable development scheme for incubator and grow on space located either in or close to the University, such as the town centre or East Street. The development scheme for the centre must be suitable for fast track delivery and implementation in order to meet contracted outputs from the scheme.

- Coast to Capital LEP Funding Programmes

Funding schemes such as the Local Growth Fund have the specific purpose of generating economic growth by co-financing such aspects and enabling infrastructure and site preparation works which can unlock development opportunities for development of commercial floorspace and housing. One of the Coast to Capital LEP's top priorities is to deliver prosperous urban centres for towns and localities with ambitions for transformational development and economic growth and to prioritise funding for them. Another priority is to develop business infrastructure and support by seeking funding to develop high quality business space so that productive businesses can flourish and bring better paid jobs to the area.

- Borough Council Initiatives

In recent years, the Epsom & Ewell Borough Council has been active in seeking to line up development opportunities. It has embarked on programme of acquiring town

centre offices as well as other sites that can play a strategic investment role, creating scope for several large projects to be brought forward. In parallel, the council has been proactive in applying for funding from a range of individual proposals. The Local Plan is an opportunity to determine what can be achieved in terms of spatial development, but this also depends on proactive initiatives in bringing forward property development. However, a number of key imperatives will underly the success in taking forward Epsom & Ewells key spatial development opportunities.

4. Key Imperatives

4.1 Key Success Factors

4.1.1 Taking account of the above challenges, opportunities and strategic ambitions, the following factors will need to be considered.

- The need for high impact interventions to reposition the borough's local economy
- Site development readiness to respond to major opportunities for transformation, to resolve shortages of employment space
- A policy framework to facilitate and respond to ongoing growth and change
- A transport system enabling unimpeded movement and reduced car dependence.

4.2 Interventions to Reposition Epsom & Ewell

4.2.1 In the early years of the forthcoming local plan period, considerable benefit could be achieved by bringing forward a manageable number of high impact development projects that will address the employment space shortages of Epsom & Ewell. These can position it for attracting businesses Involved in high-value activities, such as those involving advanced technologies which are emerging into new industries that are currently being projected.

4.3 Responses to Transformational Opportunities

4.3.1 In order to deliver these projects and to capitalise on the proposed Epsom to Leatherhead Corridor strategic opportunity area, it will be necessary to have firm development and regeneration proposals worked up. For this, a portfolio of candidate sites, proactive mechanisms to bring them forward and optimise their development will need to be in place. Prior work is needed on the design, planning and costing of schemes for supporting infrastructure, site preparation and public realm improvements and arrangements for timely procurement and delivery programmes, so that robust business cases and funding bids can be promptly generated.

4.4 Policies Enabling the Required Responses to Growth and Change

4.4.1 In parallel, it will be important to have the relevant development policies and conditions in place for ongoing investment in new development concepts, adaptation and intensification of existing employment sites and buildings.

4.5 Addressing Local Accessibility Constraints

4.5.1 In addition, there will be a need for the creation of transport infrastructure and systems that will remove the need for people to travel by car and that will significantly reduce levels of traffic congestion since this is a major constraint on new investment within the borough. Radical solutions will need to be taken forward if development proposals are to be successful.

5. Strategic Framework

5.1 Core Aims

5.1.1 The core aims of the Local Plan Spatial Economic Growth Strategy for Epsom & Ewell are to:

a) identify solutions for the provision of adequate employment space to meet the borough's needs for economic growth and change needs and within the plan period and
b) bring about the interventions and local plan policy changes and approaches required to deliver these solutions.

5.1.2 In meeting these core aims, the strategic objectives defined below will need to be pursued.

5.2 Strategic Objectives

1. To accelerate the exploitation and impacts of Epsom & Ewell's key economic growth opportunities.

2. To establish planning and development economic policies enabling optimum responses to economic growth opportunities, future changes and space shortages facing Epsom & Ewell.

3. To create the conditions to enable opportunities for investment and economic growth within Epsom & Ewell to be realised and optimised.

4. To create conditions for the movement of people and goods in and around Epsom & Ewell that address the demands of population and employment growth, taking into account future transport modes.

5. To put in place required initiatives to maximise the productive capacity of the borough's infrastructure, economy and workforce.

6. Priority Interventions

6.1.1 In order to strength the borough's longer-term economic prospects, it is proposed that the following projects, set out the each of the project profiles below, are prioritised.

Project No. 1: University Enterprise Zone and Creative Businesses Hub

Project No. 2: Accelerated Redevelopment of the Utilities & East Street Sites

Project No. 3 Longmead Office & High-Tech Expansion Hub

Project No. 4 Epsom & Ewell Cycle Network

Project No. 5 Creation of a Business Investment Zone and Required Development Tools

Project No. 1	
	University Enterprise Zone and Creative Enterprise Centre
Scope	
	Development of an enterprise workspace centre focused on high-value creative and technology-based businesses (including equine technology) offering incubator and grow on workspace. On-going programme of refurbishment and adaptation of vacant buildings to service ongoing expansion requirements of growing businesses.
Rationale	
	Surge in number of micro businesses in the digital sectors outperforming the C2C regional average. Major scope for exploitation of economic growth from local creative talent and entrepreneurism, such as that generated by UCA. Lack of grow-on space identified as a major constraint to the scaling up of growth businesses.
Outcomes Sought	Accelerated provision of incubation and grow on space. A thriving cluster of high-value creative and technology-based businesses.
Steps to Implementation	Promotion of Epsom for designation as a University Enterprise Zone. Identification and redevelopment of a suitable building for creation of up to 2000 m² for incubation and grow on space. Formation of a partnership between the University, local authorities and other stakeholders. Applications for match funding from local sources. Incubator centre development programme. Assembly of centre staff, specialist mentors and investors & engagement of potential clients and project launch. On-going programme for adaptation of under-utilised properties for grow-on space.

Project No. 2	
	Accelerated Redevelopment of Utilities, East Street and Kiln Lane Sites
Scope	Comprehensive transformation of a redevelopment corridor to the south of the Waterloo mainline bring forward: a) High-quality, integrated development on the Utilities site, incorporating mixed-uses including education, arts and culture , new employment space, housing, upgrading of the Rainbow Centre and high-quality supporting amenities. b) Intensification of adjacent sites in East Street to enhance supply of employment space. c) Redevelopment and intensification of Council owned and other possible sites at Kiln Lane for mixed use development.
Rationale	Utilities site provides opportunity for enhancing supply of employment floorspace. Gateway sites on East Street providing opportunity for development of new employment space also offering education, arts and culture. Many of the buildings on East Street have outdated interiors but with scope for intensification of office uses. Kiln Lane is a strategic employment area but significantly under-utilised. Project addresses a major shortage of office for space in all size ranges.
Outcomes Sought	Realisation of a high-profile central business district for the borough supported by high quality amenities and new housing.
Steps to Implementation	Master plan for the utilities site and adjacent East Street redevelopment opportunities. Costed programmes for site remediation and preparation for the Utilities site, public realm improvements for East Street and Kiln Lane and for relocation of existing businesses where required. Application for Enterprise Zone status for entire development zone and selected sites at Longmead. Business case for funding of site preparation and public realm works as a basis for funding to kick start redevelopment. Development agreements with preferred investors and delivery partners.

Project No. 3	
	Longmead Office & High Tech Expansion Hub
Scope	Redevelopment or reconfiguration of the council owned sites at Longmead. Provision of a complex of grow-on office and clean maker space for expanding companies with a particular focus on high technology businesses.
Rationale	Major shortage of space of all sizes throughout the borough. A shortage of high-quality premises for expanding companies requiring between 500 to 2000 ft.² is constraining business growth. Route to delivery facilitated by two adjacent sites being in council ownership.
Outcomes Sought	Through the provision of grow on space, higher numbers of micro businesses scaling up and progressing to medium size, strengthening the economic structure of the borough.
Steps to Implementation	Formulation of detailed development brief. Demolition, decontamination and site preparation works. Development agreement with the preferred investor and delivery partner. Designation of the site as part of an area-wide Enterprise Zone and the University Enterprise Zone.

Project No. 4	
Scope	**Epsom & Ewell Walking & Cycle Network**
	A comprehensive network of walking and cycling routes connecting Epsom and Ewell West and East Stations, the main Town Centre destinations, University, East street and Longmead and Nonsuch and adjacent residential areas. Creation of a cycle tunnel under the Epsom mainline. Comprehensive cycle storage, battery charging and hire hubs at stations and key employment and visitor destinations.
Rationale	
	Sustainable solution for provision of accessibility into and around Epsom. Encouragement of more people to live healthier lives. Boost to the attractiveness of the town centre and industrial areas to investors, incoming and existing employers, shoppers and visitors. Raises investment confidence required to stimulate and accelerate redevelopment and intensification of existing employment sites.
Outcomes Sought	Improved links between residential, retail and employment centres, reducing community severance. Improved and safer permeability throughout the town centre. Reduced burden of car ownership. Reduced congestion and pollution throughout Epsom Town Centre and other identified congestion hotspots. Accelerated investment commitments at major redevelopment sites.
Steps to Implementation	Design of routes. Negotiations with site owners. Costed programme of infrastructure provision. Business case for funding. Construction programme.

Project No. 5	Creation of a Business Investment Zone and Required Development Tools
Scope	Creation of required designations, investment incentives, planning and development tools to major opportunity sites to be brought forward.
Rationale	Interventions are needed to address market failure in modernising and intensification of the borough's employment zones and creating the operational environments for an optimum profile and balance of economic growth and performance matching the borough's potential.
Outcomes Sought	Accelerated transformation of the Utilities, East Street, Kiln Lane and selected Longmead sites to create a sustainable, high profile business district, additional housing capacity and high quality, complementary amenities.
Steps to Implementation	Case and application for Enterprise Zone status covering the Utilities, East Street, Kiln Lane and Longmead area. Support to UCA in achieving designation of a University Enterprise Zone. Investment into flexible planning mechanisms such as a local development order and masterplans and development briefs. Setting up required procurement arrangements to assure fast track delivery required to satisfy public sector funders. Participation with Surrey County Council in defining an ambitious vision and implementation plan for the proposed M25 J9 Leatherhead to Epsom Growth Corridor.

7. Supporting Measures for Spatial Economic Development

7.1 Establishing the Policy Responses to Growth Opportunities and Change

7.1.1 Because Epsom & Ewell has a limited range of development options for accommodating the economic growth of Epsom & Ewell, the main opportunities for rectifying the under-supply of employment floorspace are on existing employment sites with scope to be re-cycled, re-developed and intensified.

7.1.2 Achieving this will depend of having a Local Plan development policy framework that will inspire, facilitate and guide the way forward in maximising the benefits of change and growth, subject to the necessary controls. The borough's ambitions, targets and approaches to growth will need to be clearly articulated, in parallel with policies and proposals that enable the developments that will realise the preferred growth opportunities to proceed and shortages of employment space to be resolved. In this regard, a number of policy interventions will be required.

a) A policy for retention of office and industrial space and the continued use of Article 4 directions.
b) Guidance on future development mix of across strategic employment locations, defining where different types and sizes of uses will be located and under what conditions.
c) General polices for enhancing provision of small business workspace and medium sized offices and locations for business incubators and enterprise centres.
d) Policy for change of use of disused retail units.

7.1.3 Within the policy framework, guidance will need also to be provided for:

- incorporating employment space into high density mixed-use residential schemes
- supporting the growth in students and visitors, including housing, provision of performing arts and cultural venues, food and beverage outlets
- opportunities to encourage the growth of the visitor economy
- individual sites with major potential for redevelopment and reuse
- the provision and siting of infrastructure for advanced transportation.

7.1.4 This policy background should provide the framework for site specific policies that will inform future master planning, development briefs and public realm improvements. This will include policies and development management guidelines for:

Town Centre

- Policies for provision of additional large office sites, wider choice of small and medium sized offices, change of use policies for empty retail units, siting of hubs for food and beverage, culture, entertainment and experiential retail and change of use policies for accommodating health and community services and guidance on mixed use schemes.

- Vision and policy for the site assembly of East Street north and south and Utilities sites

- Updating of Plan E Area Action Plan to address current opportunities and proposals.

Longmead and Nonsuch

- Vision and policies for the major site assembly, consolidation of the motor trades, retention of employment uses and provision of small affordable offices and high-tech space within the industrial areas with scope for intensification of industrial and warehouse uses.

Ewell and Stoneleigh

- Policy for village economic growth.

The Downs

- Policies to enable new equine stables and supporting infrastructure for equine development within the Green Belt and other sporting and leisure facilities.

7.2 Creating the Conditions for Investment and Economic Growth

7.2.1 To enable use of employment land and property to their full potential, a strategic approach will be needed to the regeneration, renewal and where appropriate, intensification of the older office locations, industrial estates and under-utilised areas in the outlying urban areas, including the unlocking the potential of Ewell and Stoneleigh as small-scale sustainable business locations.

7.2.2 Within this strategic policy framework, proactive interventions will be required in order to bring forward development of specific sites that relate to those growth opportunities that Epsom & Ewell wants to support.

7.2.3 In each case, a robust, ambitious and exciting vision needs to be formulated and communicated, set against supportive policies oriented to developing the capacity of

employment land and property so that it can be used to its full potential. A number of key tools need to be deployed for this to be achieved.

- *Feasibility Studies and Strategies*

Forward looking site development feasibility studies and strategies for the regeneration and revitalisation of the industrial areas and other employment locations will be needed to inform on-going development planning and preparation of costed implementation programmes.

- *Masterplans*

Imaginative masterplans will be needed to set out the vision for each of the main development zones. These need to clearly reflect the local ambitions of how these are to be transformed, to suggest the types of scale of development that is acceptable and aspired to, clarify where different uses are to be located and how these are to be integrated with other forms of development local amenities, infrastructure and environmental assets. These must also be carefully crafted to tie in with measures to reduce traffic levels and congestion and to maximise their impact in alleviating shortages in high quality business floorspace.

- *Development Briefs*

Development briefs then need to be formulated for individual sites to confirm the parameters of development, expected design standards and supporting infrastructure.

- *Public Realm Improvements*

Detailed plans for public realm investment and improvement need to be put in place and implemented in advance of site developments taking place, in order to ensure that the required investment is attracted and that the capacity and quality of such developments is optimised.

- *Bringing the Projects Forward*

Defining and implementing a sequential programme of such initiatives will be a key step in demonstrating movement forward from the status quo. Further to this, there is a need to formulate specific projects based on feasibility studies, project programming and costing, setting up fast track procurement mechanisms and the selection of delivery partners, the formulation of business cases and the preparation of bids submitted for funding sources. The borough is already progressing useful work in preparing and submitting a number of proposals to relevant funding sources.

7.3 Providing for Unimpeded Movement into and Around Epsom & Ewell

7.3.1 Creation of the conditions for a modernised, fully functional urban public transport system will be essential to the success of the development initiatives aimed at enhancing the supply and quality of the borough's employment space. To achieve this objective improved multi-mode accessibility for each of the employment areas will need to be incorporated in the Local Transport Plan. In this regard, several key factors need to be considered.

- *Local Access*

- Alternative measures to provide seamless accessibility into the major employment zones such as the proposed comprehensive walking and cycling network.

- *Inter-modal Integration*

- Convenient and rapid transfer between rail, bus, and bicycles and in the long term, electric vehicles for hire, drop off and with pick up points at the fringes of the town centre in advance of the advent of autonomous vehicles.

- *Permeability*

- Enhancements of cycleway and pathways to enable workers, shoppers and visitors to move unimpeded from the transport gateways and interchanges to and through the various parts of the urban areas they need to get to.

- *Vehicle Usage*

- Comprehensive infrastructure strategy to support the advent of low emission vehicles - provision of charging capacity, charging points, parking depots and servicing facilities for vehicles to hire parking bays and drop-off and pick up points.

7.4 Maximising the Productive Capacity of the Borough's Infrastructure, Economy and Workforce

7.4.1 To successfully accommodate growth of its key sectors and tomorrow's industries, the required response from Epsom & Ewell is getting maximum positive impact from the infrastructure, resources and support mechanisms which enable businesses and the workforce to work to full efficiency whilst adapting to changed business and employment models brought about by new technologies, climate change and wider global shifts.

7.4.2 Key measures will include:

- Optimising the scope of major development opportunities in the town centre and the industrial estates as described above.

- Measures to ensure a fully functioning and accessible town centre.

- Possible set up of a Business Investment Zone – Identify boundaries of special status employment area on the Local Plan Inset Proposals Map.

- Provision of very high capacity broadband.

- Encouraging maximum use of sustainable working practices such as homeworking and small business workspaces and support hubs.

8. Concluding Comments

This strategy has sought to highlight the major challenges faced by Epsom & Ewell in matching the quantity and quality of employment space needed to address anticipated patterns of economic growth and change, alongside proposed solutions. Proactive and imaginative redevelopment of existing sites and buildings already in employment use will be the route forward, encouraged by County level proposals to include the borough as part of a Strategic Opportunity Area within the Surrey 2050 Place Ambition.

Bringing forward redevelopment of the Utilities and adjacent East Street sites, and key sites at Kiln Lane and Longmead, along with the creation of a major incubator complex in association a possible University Enterprise Zone will provide the conditions for the creation, growth or attraction of tomorrow's industries and a competitive and prosperous local economy.

Having the required planning policies, designations and development tools in place to deliver these solutions will be critical to optimising the benefits of future growth and change within the borough.

The provision of alternative choices to car use by way of improved cycling and walking infrastructure and the introduction of new networks and systems for vehicles based on clean technologies will help alleviate local congestion whilst providing a healthier environment and lifestyle for local residents and workers.

A series of ambitious but realistic proposals has been put forward. It will now be for Epsom & Ewell and its partners to take up these challenges to deliver the substantial and lasting local benefits that these can now bring about.

RACE TRAINING & EQUESTRIAN INDUSTRY: LOCAL PLAN BACKGROUND PAPER

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annexe 1 Scoping Report on the Racecourse & Equestrian Sector in Epsom & Ewell Borough
Other available papers (not attached):	N/A

Report summary

The new Local Plan needs to capture the context, socio-economic benefits and issues that are key for the borough. The racecourse and equestrian sector have long been recognised as being part of the identity of the borough, with Epsom being the home of the Derby.

The Scoping Report on the Racecourse & Equestrian Sector was commissioned to form part of the evidence base for the new Local Plan.

Recommendation (s)

The Committee notes the contents of the Scoping Report on the Racecourse & Equestrian Sector as a technical study that will form part of the evidence base for the emerging new Local Plan.

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

1.1 The Scoping Report on the Racecourse & Equestrian Sector (Scoping Report) will form part of the evidence base for the emerging Local Plan policies. The delivery and implementation of the Epsom & Ewell Borough Local Plan will ensure sustainable growth is planned in the Borough to meet the Corporate Vision, priorities and values.

2 Background

2.1 The Core Strategy 2007 and Development Management Policies 2015 recognise that Epsom has long been associated with horse racing. The borough benefits from the racecourse, associated buildings, and facilities for the local racehorse training industry, all contributing to the local identity.

2.2 So as to ensure the new Local Plan appropriately captures the context, socio-economic benefits, and issues, and includes the right interventions, the Scoping Report was commissioned to form part of the evidence base.

3 Proposals

3.1 The Scoping Report has identified interventions that could form the basis of enabling policies for the new Local Plan.

3.2 Interventions include establishing a racing zone, enabling investment into the racecourse, the provision of accommodation for key workers, capital investment through controlled enabling development, inward investment to the sector, growing the visitor economy, supporting the industry, and place recognition that Epsom is the 'Home of the Derby'.

3.3 The Scoping Report provides the context and identifies the interventions that could be realised and enabled through policies in the new Local Plan.

4 Financial and Manpower Implications

4.1 The Scoping Report has been prepared within agreed budgets by external consultants Matthew's Associates.

4.2 The planning policy team have undertaken the commissioning and contract management of the project.

4.3 ***Chief Finance Officer's comments:***

5 Legal Implications (including implications for matters relating to equality)

5.1 The Local Plan will be examined to assess that it has followed legal and procedural requirements and that it is 'Sound'. For the Plan to be considered Sound, it needs to meet the following tests:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

5.2 The Scoping Report will inform the strategies and policies contained within the emerging new Local Plan in order to ensure that they meet the tests of soundness.

5.3 ***Monitoring Officer's comments:*** *none for the purposes of this report.*

6 Sustainability Policy and Community Safety Implications

6.1 The new Local Plan will contribute towards delivering the Council's objectives and priorities.

6.2 Proposed policies are subject to a Sustainability Appraisal which is an integral part of the plan making process.

7 Partnerships

7.1 Local Planning Authorities have a duty to cooperate with public bodies on strategic planning issues that cross administrative boundaries.

7.2 Matthew's Associates have engaged with a wide range of partners and commercial interests in preparing the Scoping Report.

8 Risk Assessment

8.1 Insufficient evidence to support the new Local Plan policies may result in the Local Plan not meeting the test of Soundness of being positively prepared, justified, effective and consistent with national policy.

9 Conclusion and Recommendations

9.1 The Committee notes the contents of the Scoping Report on the Racecourse and Equestrian Sector as a technical study that will form part of the evidence base for the emerging new Local Plan and be published on the Council's website.

Ward(s) affected: (All Wards);

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Matthews Associates

Scoping Report on the Racecourse & Equestrian Sector in Epsom & Ewell Borough



December 2019
Final Draft V1.3

Panel Expert
OPE Programme

Cabinet Office

Local Government Association

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1.0 Preface:

Matthews Associates (UK) Ltd have provided economic development support to Epsom and Ewell Borough Council since 2014. We work across the South East providing economic development services to primarily Local Authorities and Local Enterprise Partnerships. We are a registered Cabinet Office One Public Estate 'pool of experts' consultancy.

2.0 Introduction:

Epsom & Ewell Borough Council commissioned this scoping study to investigate the wider equestrian sector within the Borough, primarily utilising existing published research and datasets (Annex A), supplemented by additional qualitative intelligence from sector leaders and representatives (Annex D).

2.1 Epsom Borough

Epsom Borough is one of the smallest local authorities in the England, covering an area of just 34 km sq, is ranked by size at 289th out of 317 English local authorities. Often considered as predominantly urban and perceived as part of the Greater London Conurbation, the Borough outside the core urban centres of Epsom Town, Ewell Village and Stoneleigh, the Borough is relatively rural, especially around Epsom Common to the west and the Epsom and Walton Downs to the south. These open Downs directly transition into the new 260 hectare Langley Vale Centenary Wood, extending into neighbouring Mole Valley and Reigate and Banstead Districts, bordering the M25 orbital motorway.

Annex B is a map showing the areas officially classed as rural within an LEP area as defined by Defra Magic Mapping. Epsom is not within the Surrey Hills AONB but is adjacent to it, via an AGLV[1] corridor running north from Reigate and Banstead. Businesses based in this southern sector of the Borough would be eligible to participate with Surrey Hills Enterprises.

2.2 The Epsom and Walton Downs

The Epsom and Walton Downs are located to the south of Epsom Town, linked to the town by road, public footpaths and bridleways. The Epsom and Walton Downs covers 600 acres of rural space, much of it open to the public for leisure and recreation. Epsom Racecourse is located within Downs, as are the horse training areas, the grass gallops, the all-weather gallops and the majority of the racing horse training stables. Many of these professional training areas are inter-crossed by public footpaths, public bridleways, designated cycle routes and public hack routes. The Epsom & Walton Downs are subject to a unique Act of Parliament[2] and are managed by the Epsom and Walton Downs Conservators.

Annex C (a) is a map showing the Downs area and complex arrangement of footpaths, bridleways, cycle routes, hack routes, training gallops that are located within it. Annex C (b) shows the distribution across the Borough of Racehorse Training stables (in blue) and general equestrian businesses (in orange).

[1] Area of Great Landscape Value: https://mk0surreyhillsnfif4k.kinstacdn.com/wp-content/uploads/2016/02/Recommended-additional-areas-Oct-2013-low-resolution-OS-base.pdf

[2] Epsom and Walton Downs Regulation Act 1984 see: http://www.edmac.org.uk/Byelaws%20Epsom%20and%20Walton%20Downs%20Conservators.pdf

3.0 'A Vision For Epsom'

Recognising the challenges facing the equestrian sector, in 2017 the Jockey Club, British Horseracing Authority, Epsom & Ewell Borough Council and University of Surrey developed a 'Vision for Epsom'[3] this document and the working groups formed to deliver it shared the following objectives:

- Increase the number of horses in training to 250 by 2021 and more beyond 2021;
- Make Epsom a centre for digital innovation in horseracing;
- Increase the economic value of the local horseracing;
- Conserve and improve the Downs for the local community and for horseracing; and
- Work across the horseracing industry to develop wider economic and social proposals to benefit Epsom.

Progress has been slower than anticipated and it is unlikely that the number of horses in training will rise to 250 by 2021, but the core workgroup members remain fully committed to bring forward the vision objectives, albeit on an extended timeframe.

4.0 Equestrian Context:

This information scoping report aims to synthesise a large amount of information, data and research contained within a number of externally published reports referenced within Annex A. This has been supplemented by interviews with representatives from both the racehorse training sector and the Racecourse (Jockey Club) itself (see Annex D).

Key messages from the consultation:

The professional horse racing sector in Epsom is at a tipping point of viability, measures must be taken to stop the decline and facilitate investment in essential infrastructure.

Epsom has many unique advantages as a training centre of excellence, its location and proximity to London is one of them, the adjacent Downs and racecourse are others.

Formal recognition of the sector and appropriate planning policies to both protect it and enable future investment and sustainable growth are needed.

It is also important to clarify the individual elements that make up the wider term 'equestrian' sector especially in relation to Epsom's racehorse training sector:

4.1 The Racecourse

Epsom racecourse is internationally renowned as the home of the Derby, flat racing's 'blue riband' event. Currently holding 11 racing fixtures per annum, the remaining time the racecourse is a key meetings, conferences, events and functions venue (MICE), hosting over

[3] https://www.epsom-ewell.gov.uk/sites/default/files/documents/business/economic-development/Epsom%20Vision%20leaflet.pdf

500 such events each year. Owned by the Jockey Club[4] Epsom is considered one of their key venues, although only ranked as number 10 out of 60 racecourses by the Racing Post[5]. In terms of Epsom's wider economy the racecourse would rank as the Borough's leading visitor attraction and among the largest employers within the Borough, albeit most employees being on casual contracts. The racecourse has a substantial supply-chain of nearly 500 suppliers and contractors with over half locally based in the Borough.

4.2 The Training Sector

The UK's racehorse training sector supplies horses for both flat and jumps racing, with the British Horseracing Authority estimating around 14,000 horses in training. Newmarket and Lambourn are considered to be the UK's leading areas for training, with an estimated 3,500 horses at Newmarket and 1,500 horses at Lambourn. Epsom in the 1970's trained around 500 horses in 19 training stables, by 2019 this has dropped to around 150 horses in 12 training stables[6].

4.3 Livery Stables & Riding Schools

In addition to professional racing training stables, the Borough also has a number of livery stables and riding schools providing horse accommodation, training and riding facilities for horse owners and riders outside the professional racing sector. Although both are considered within the wider 'equestrian sector' there is a significant delineation between them, with livery stables and riding schools aimed at mainly amateur and leisure horse owners & riders. These riders tend to transport their horses to other leisure riding locations or take advantage of the extensive network of local bridleways and byways in Epsom and adjacent areas. There was historically some perceived tension between the professional sectors and amateur leisure owners and riders, often caused by non-adherence to prescribed training times and the close proximity of some leisure bridleways and hack routes to the professional gallops.

4.4 Bloodstock and Stud

Although valued at an estimated £427m[7], Epsom even with its strong racing heritage is not considered a major area within the equine bloodstock and stud sector. The County of Surrey is listed[8] as having 75 breeders, housing 156 mares (2.5% and 1.8% of GB respectively) the largest number being in Suffolk and Yorkshire. Online bloodstock/stud directories indicate under five bloodstock/stud farms in Epsom.

4.5 The Equestrian Supply Chain

The wider equestrian sector in Epsom supports an extensive and diverse supply chain, ranging from conference and event support businesses for the racecourse (estimated at nearly 500 companies), general equestrian supplies providers (feeds, consumables, tack, grooming, clothing etc), horse transportation providers, farriers, saddlers, hotels and accommodation, through to the highly specialist equine veterinary practices and therapists supporting the thoroughbred training stables. Although some are based within the

[4] Jockey Club owns 15 racecourses across the UK, 3,000 acres of training land, and the National Stud. The Jockey Club Group had an annual turnover of £215m in 2018 (68% increase over a decade).
[5] https://www.racingpost.com/guide-to-racing/top-ten-racecourses/
[6] Rapleys LLP: Epsom Downs Racecourse and Racehorse Training Industry, draft report 2019, data source The Jockey Club.
[7] PWC 'The contribution of thoroughbred breeding to the UK economy and factors impacting the industry's supply chain' Sept 2018
[8] Weatherbys General Stud Book Factbook 2018

Borough, many are based locally in adjacent Boroughs and Districts. There is insufficient local data to calculate the direct, indirect and induced economic contribution, however using the SQW data model from Lambourn[9] crudely applied to Epsom's training numbers, Epsom's training sector alone (excluding racecourse) could be making a £2.1m contribution to the local economy.

4.6 Riding for the Disabled

Epsom is also home to the well-respected equestrian charity, Epsom Riding for the Disabled, operating out of St Ebba's Farm, a 16 acre site currently working to capacity to provide 3,000 rides to over 300 people annually. The charity has ambitious plans to extend the indoor school and arena, granted planning permission in 2019.

4.7 The Geography

Although this report is primarily focussing on the sector within Epsom & Ewell Borough, it should be noted that there is a considerable overlap into adjacent and neighbouring Districts and Boroughs, of note Mole Valley District Council, where a number of equestrian businesses are technically based although consider themselves part of the wider Epsom racing and training sector.

4.8 The Epsom & Walton Downs

The ownership and interrelationship between the racecourse and Downs should also be noted within the context of the wider racing sector. Although the actual racecourse and majority of the Downs is in the ownership of the Jockey Club, the Downs have certain public access rights granted via a specific Act of Parliament[10] which in effect gives open access to (although not use of) many key training areas such as the gallops. The Downs are managed by the Conservators, funding to maintain the Downs is generated by a precept levy arrangement between the Council, Racecourse, Landowner and Training Ground Management Board (TGMB). There are set times allocated when training use of the Downs has priority over leisure uses, this can sometimes cause conflict between professional and leisure users.

5.0 Socio-Economic and Wider Benefits

5.1 Economic Benefits

The extensive research undertaken at other racing venues and training areas (see Annex A) clearly demonstrate the economic value of the wider equestrian sector to the economy. Epsom benefits from having both an internationally recognised racecourse (and MICE[11] venue) and an allied training sector based within the Borough. The Vision For Epsom document[12] estimates the value of the sector at £13m, the SQW methodology for Lambourn would, based on the number horses in training at Epsom estimate this to be around £2m. This disparity notwithstanding, Epsom's combined horse training, horse racing, wider equestrian and racecourse MICE operation represents a significant multi-million pound sector group to the Borough's economy.

[9] Lambourn Report, SQW, March 2019, estimated contribution for 1,547 horses £22.6m, £14.6k per horse, Epsom 146 horses, £2.1m
[10] Epsom and Walton Downs Regulation Act 1984 see: http://www.edmac.org.uk/Byelaws%20Epsom%20and%20Walton%20Downs%20Conservators.pdf
[11] MICE stands for Meetings, Incentives, Conventions and Exhibitions, although recently rebadging as 'the meetings & events industry'
[12] https://www.epsom-ewell.gov.uk/sites/default/files/documents/business/economic-development/Epsom%20Vision%20leaflet.pdf

5.2 Social and Community Benefits

The racecourse in addition to its racing dates and commercial MICE activities, also supports the local area with community hire rates, in-kind support and occasional financial sponsorship. The management of the racecourse also supports local partnerships such as Visit Surrey Destination Management Organisation and the Epsom Business Improvement District, and are considered to be key local stakeholders. Many training stables also participate in community open days to enhance local appreciation of their sector and foster good relationships with their local communities.

5.3 Leisure and Wellbeing Benefits

These can both be overlaid onto the considerable environmental and natural capital benefits of the adjacent Epsom and Walton Downs and developing Woodland Trust Centenary Wood at Langley Vale. The combination of Jockey Club ownership, Epsom & Ewell Borough financial and operational support (via the Conservators) and the TGMB funding contribution, allow this important open leisure space and 'managed' landscape to be maintained and ultimately preserved. Not only for equestrian pursuits, but also for wider walking, running, cycling, dog-exercising, events and even a simple appreciation of the countryside setting and spectacular views over London.

5.4 Visitor Economy

The annual racing fixtures and especially the Derby are well-known and attract many visitors to the Borough supporting the hospitality and accommodation sectors. The challenge remains on how to capitalise on this unique asset, so close to the London conurbation outside racing and event days. The Downs as a high-quality managed open-space and presence of a thoroughbred racing sector, equestrian facilities and opportunity for wider leisure and recreation activities presents future opportunities.

5.5 Establishing Place

Epsom is a comparatively small local authority in Surrey, directly adjacent to the Greater London conurbation. Epsom Racecourse, The Derby and the allied equestrian sector gives the Borough a unique selling point, international point of reference and identity as 'The home of the Derby'. Whereas historically Epsom was linked to Epsom salts, its wider equestrian heritage, racecourse and training sector provides a current and potentially key future identifier for the Borough. Such positive identifiers will become increasingly important in attracting inward investment, the recruitment and retention of staff, the aforementioned visitor economy and contributing towards social cohesion through experiencing and sharing a common place value.

6.0 Key Issues Facing the Sector:

6.1 Epsom Racecourse

Although host to the Derby, an internationally renowned 'Blue Riband' event, Epsom currently only has 11 actual horseracing days within its normal annual calendar. Although currently able to hold up to 16 racing days per annum, additional meetings have to be 'bid' for from the British Horseracing Authority. Considerations such as viability, racing surface, competing races, annual UK calendar need to be considered before adding any new races.

Outside these core racing days, the racecourse is a key MICE venue for both the Borough and wider East Surrey. Although holding over 500 such events each year, the venue must maximise its utilisation to generate essential revenue and profits to operate and maintain it every year. To compete with other GB racecourses and local 'MICE' venues the Jockey Club must be able to justify continued capital investment in the venue. There are currently aspirations to invest in the site across a number of key areas: including Prince's Stand (Grade II Listed Building located to the west of Queen's Stand); The Stables, Stable Staff Accommodation and Paddock Office areas; Derby Stables; and Warren House. These will require the Jockey Club to make a significant capital investment in Epsom, against competition from the other 15 venues and wider Jockey Club estate.

6.2 The Racehorse Training Sector

Epsom's racehorse training sector has been in gradual decline, in the 1970's with 19 trainers with 520 horses, has fallen to 12 trainers with 174 horses in 2010, to the most recent figures (2019) indicating the same number of trainers (12) but with only 146 horses in training. This is widely believed to be nearing lowest level of horses in training to retain viability of the sector locally. Many factors are cited as reasons for this decline: ranging from structural changes within the racing sector; concentration of GB training at Newmarket and Lambourn; increased competition from overseas trainers; retirement of long-established trainers; loss of training stables to residential development; restrictions on land-use and ability to generate investment capital from enabling development; lack of modern, suitable and affordable staff accommodation; limitations of local specialist support and supply-chain. It has also been noted that a lack of cooperation among the Epsom training stables to collaborate and compete with other training areas and competition from outside the UK is a contributory factor, see: 'A Vision For Epsom' (section 3.0).

6.3 Livery Stables & Riding Schools

There is little empirical data on the number of general livery stables and riding schools operating within the Borough although local intelligence indicates that in-line with the thoroughbred racing training sector there has been a similar decline as owners retire, stables have been sold for residential or solely private use, and existing livery stables find challenges with staff recruitment, retention and accommodation. A recent East Surrey tourism research project[13] included equestrian tourism within its remit; the feedback from this study mirrored the local Epsom intelligence that there had been a general decline in livery stables and riding schools across wider East Surrey for similar reasons.

6.4 Bloodstock and Stud

Epsom is not a primary bloodstock and stud area for the wider racing sector, although with many breeders based across the wider South East it does form an important element of supply chain to the thoroughbred training sector in Epsom. Some Epsom training stables also provide some bloodstock/stud services in addition to their core training offer.

[13] Tourism South East: Wheels, Feet & Hooves (Mole Valley) & East Surrey Tourism Cooperation - 2018

6.5 Equestrian Supply Chain

Taking out the racecourse MICE supply chain, the specific supply chain supporting the training, livery, stable and school sector could be worth over £2m using the Lambourn SQW model, applied to Epsom. Our discussions with key local sector representatives indicate that the declining and now historically low number of horses in training are providing viability challenges to some specialist businesses. The ability to justify recruitment of new staff and investment in their business needs to be predicated on the growth of the sector. Therefore it is important if the symbiotic relationship between training sector and its supply chain is to remain viable and grow, Epsom needs to attract greater numbers of horses in training.

6.6 Future Developments

Like any commercial sector and performance sport, the equestrian sector has had to evolve and develop to maintain its competitive edge. Equine veterinary, therapy and training method related developments have been happening at pace internationally. Affiliations with centres of excellence such as Surrey University's School of Veterinary Medicine will be key to the sector's future success. These developments will require changes to the core infrastructure of the sector, modern new facilities, specialist buildings, redesign of existing facilities, not only for the horses but also the trainers, jockeys and stable staff employed.

7.0 Support from the Local Authority

Although many of the challenges facing the racecourse and wider sector are outside the direct purview and influence of a local authority, a local authority does have some key levers available to support the wider equestrian sector.

7.1 Economic Development Function

The Borough via its economic development function has the ability to positively engage with and support the sector. Acting as a conduit to both Officers and Members, including the Chief Executive, the Borough's economic development function can be an advocate for the importance of the sector, identifying areas within the Borough and partner authorities such as County and Local Enterprise Partnership where assistance and support can be found.

7.2 Planning Policy

The development of the new Epsom & Ewell Local Plan presents an rare opportunity to review and potentially revise local planning policy to recognise and support the wider equestrian sector development needs, but within the parameters of the National Planning Policy Framework and Green Belt considerations.

8.0 Interventions to Consider:

8.1 Racing Zone

Formal recognition of the wider equestrian and specific racing training sector within a designated 'racing zone' or contained within supplementary planning guidance, policies or area delivery plan should be considered. Finding appropriate enforceable mechanisms to recognise the wider equestrian sector, specifically the racing training sector, giving them

suitable protection against speculative development, yet supporting their viability and future growth potential should be considered. Best practice in other similar areas such as Newmarket and Lambourn should be reviewed and considered.

8.2 The Racecourse

Epsom racecourse itself should be supported to remain viable and profitable to enable capital investment in current and future infrastructure. Although horseracing should remain its core baseline activity, formal recognition should be given to the need for the racecourse as a venue to be fully utilised outside racing fixtures via its conference centre MICE activity and wider tourism and event activities. Future planning policies and operating restrictions should be flexible enough to allow all-year utilisation of the main site and its ancillary locations across the Jockey Club estate.

8.3 Employee Accommodation

The housing and accommodation needs of employees, stable staff, trainees and key workers within the wider equestrian sector should be considered in-light of unaffordable local house prices[14] and rental levels[15]. Employee accommodation that meets modern safeguarding requirements, industry best-practice and regulations on overnight cover[16], should be considered both on-site and nearby to the core operating locations. Strict planning policies, Section 106 requirements etc, can be used to prevent inappropriate 'back-door' commercial residential development.

8.4 Visiting Accommodation

Visiting stables competing at the racecourse also require affordable adjacent accommodation, which could be utilised as touristic accommodation outside race meetings. Lack of such affordable accommodation for visiting stables can be perceived as a negative by potential stables wishing to compete at Epsom racecourse.

8.5 Capital Investment

The need for capital investment in the sector's infrastructure should be recognised and accommodated for within future planning policy. The requirement for enabling residential development to release capital should be considered, yet ensuring via mechanisms such as S106 agreements, that capital released is ring-fenced for direct investment in the sector infrastructure such as improved facilities, staff accommodation or specialist equipment.

8.6 Inward Investment

Although linked to 7.4 Capital Investment, the need to attract wider inward investment to the sector should be considered as a priority. In addition to improvements to the racing training stables themselves, allied support sectors such as specialist veterinary practices, equine therapy facilities, specialist transportation companies, equestrian sector training providers (for employees), bloodstock/stud farms, farriers, saddlers, feed, livery and tack suppliers, equestrian holidays and equestrian experience operators, etc all may be valid components of a wider industry and have a justifiable place within a designated equestrian

[14] Ratio lower quartile house price to lower quartile gross annual (workplace-based) earnings (2013 to 2018) is 15.5 (LGA)
[15] Average monthly rent £1,924pcm, median rent £1,651pcm: source home.co.uk
[16] Example of best practice, Lambourn: https://lambourn.org/public-consultation-collingridge-farm-development/

zone or within specific policy guidelines. Policies should acknowledge the current and potential future needs of the wider rather than narrow sector.

8.7 Visitor Economy

The wider visitor economy potential of the equestrian sector and the leisure and tourism use of Epsom and Walton Downs should be considered within future planning policies. Such a high quality managed open green-space and the new adjacent Langley Vale Centenary Wood offer opportunities to appropriate small-scale and limited developments such as restricted use visitor accommodation, bunk houses, camping and glamping sites, waymarked trails & routes and associated supporting infrastructure.

8.8 Industry Support

Although Epsom & Ewell Borough Council is a founder member of the 'Vision for Epsom' initiative and working group, its progress has been slow and to date few hard outputs and outcomes achieved. In order to compete with other UK and International training areas Epsom's racing sector must coalesce around a shared objective to stabilise and grow the sector. Support via a positive Local Plan will only go some way to achieve future viability and success. Epsom and Ewell Borough Council through strategic support via the political leadership, officers and its functions such as Economic Development can help achieve this.

8.9 Place Recognition

Epsom is generally recognised as the 'Home of the Derby' with many local organisations and some public signage adopting a horse racing theme. Although this is in itself positive, the association really only links to a single race rather than the wider racing industry and equestrian sectors based across the Borough. Future consideration should be given how best Epsom's wider equestrian and thoroughbred racing associations can be exploited in terms of place management and place promotion. This would help both the sector to raise its profile to owners, syndicates and other trainers but also give the residents and businesses within the Borough an enhanced sense of identity and place.

9.0 Conclusion:

Epsom's wider equestrian sector is uniquely located adjacent to London, is accessible to both national and international markets, boasting both a significant thoroughbred training sector and internationally renowned racecourse, sited within the managed beauty and tranquillity of the Epsom & Walton Downs. Recent challenges have resulted in a decline in the number of horses being trained on the Downs and commensurate loss of training stables. There is an opportunity through the development of the new Local Plan to put into place polices and measures to help protect and support the wider local equestrian sector, providing a secure and stable base from which it can gain viability and future growth potential.

Annex A – Literature Review

Epsom Downs Racecourse and Racehorse Training Industry
Draft report October 2019 (to be published)
Contact: Wakako.Hirose@rapleys.com

Vision For Epsom
Leaflet produced by Jockey Club, Epsom & Ewell Borough Council & Surrey University
https://www.epsom-ewell.gov.uk/sites/default/files/documents/business/economic-development/Epsom%20Vision%20leaflet.pdf

Horse Racing in Lambourn Valley - The Industry's Economic and Social Impacts January 2019
SQW – January 2019
https://d1jxmchgl7b0ql.cloudfront.net/documents/Lambourn-FINAL-v10.pdf?mtime=20190325112802

The General Stud Book
Weatherbys Fact Book 2018
http://edition.pagesuite-professional.co.uk/Launch.aspx?EID=67f57b97-f5a6-4c9d-91b4-ad377a693f23

The contribution of thoroughbred breeding to the UK economy and factors impacting the industry's supply chain
PWC - Sept 2018
https://www.thetba.co.uk/wp-content/uploads/2018/09/TBA-Economic-Impact-Study-2018.pdf

British racing – the structure of the industry
BHA – Sept 2018
https://www.thenhc.co.uk/wp-content/uploads/2018/09/Structure-of-the-industry-26-Sep-2018.pdf

Newmarket's Equine Cluster
SQW - 2017 update on their 2014 report for West Suffolk Council
https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/D12-Newmarket-s-Equine-Cluster-a-short-update-to-the-2014-report-2017.pdf

British Horseracing's International Influence
Henham Strategy – 2019
https://www.britishhorseracing.com/wp-content/uploads/2019/06/British-Horseracings-International-Influence-June-2019.pdf

Economic Impact of British Racing
Deloitte – 2013
https://www2.deloitte.com/content/dam/Deloitte/uk/Documents/sports-business-group/deloitte-uk-economic-impact-british-racing-2013.pdf

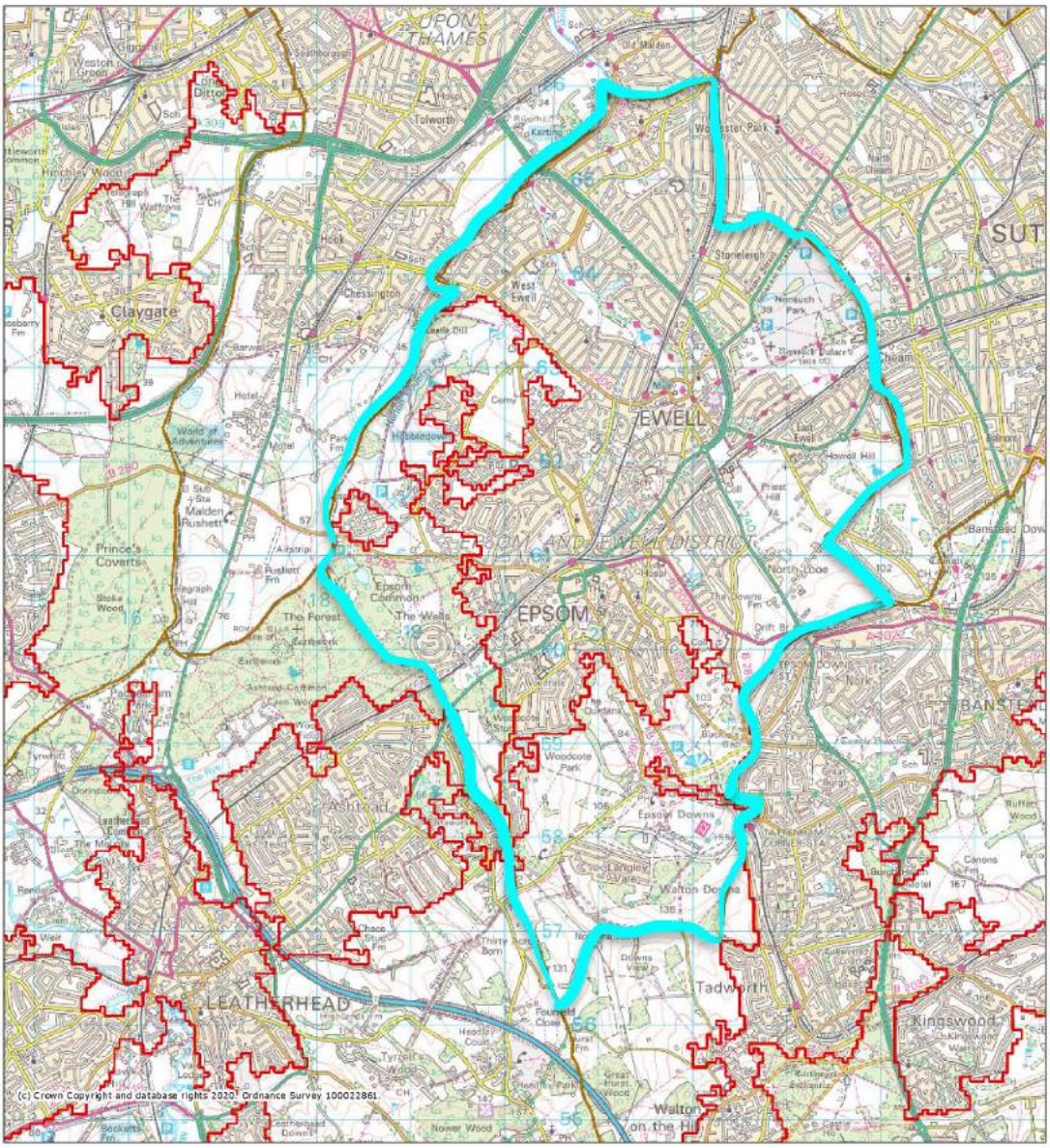
Impact of the Horseracing Industry in Yorkshire
Centre for Regional Economic and Social Research Sheffield Hallam University – March 2011
https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/impact-horseracing-yorkshire.pdf

A report of research on the horse industry in Great Britain
The Henley Centre March 2004 (Commissioned by DEFRA and the BHIC)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69259/pb9255-bhic-report-040318.pdf

Annex B – Magic Mapping of Epsom Borough

MAGIC

Magic Map



Legend

- LAU1 - Districts and Unitary Authorities (England and Wales)
- Rural areas within Local Enterprise Partnerships (England)
- Epsom & Ewell Borough Boundary

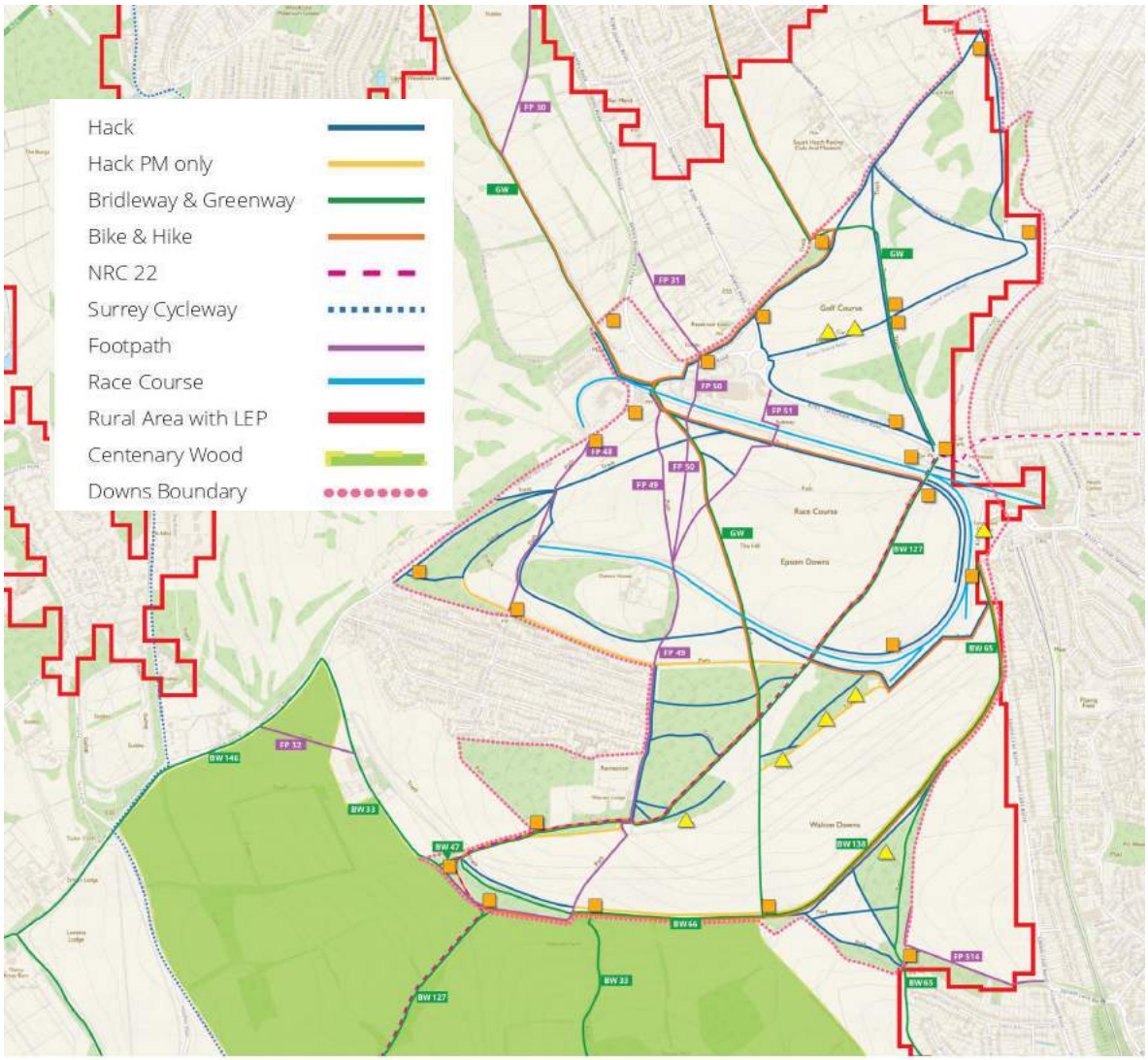
0 1 2
km

Projection = OSGB36
xmin = 513300
ymin = 156800
xmax = 527100
ymax = 164800

Map produced by MAGIC on 7 January, 2020.
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Annex C – Map of Epsom Downs & Distribution of Equestrian Businesses

Map (a) showing various access methods to the Downs



Map (b) showing equestrian business distribution across Epsom Borough and adjacent area



Horse Trainers: note some pins are overlaid on the same postcode.

Equestrian related businesses i.e. riding schools, liveries, equine supplies etc

Annex D – Consultees


Image: © Surrey Comet

Simon Durrant – General Manager Epsom Racecourse

(Representing The Jockey Club and Racecourse)

Simon Durrant has considerable experience in racecourse management, having previously worked for Jockey Club Racecourses for 11 years, including management stints at all three racecourses in the group's London region - Epsom Downs, Sandown Park and Kempton Park. In his role, Durrant is part of a senior team running race Epsom's meetings, including the Investec Derby, one of the best attended days in the UK sporting calendar. He is also responsible for continued growth across all areas of the Epsom Downs business, including the racecourse's conference and events operation. (extracts from SportsPro Nov 2012).


Image: © Surrey Comet

Simon Dow - Clear Height Stables

(Representing the Professional Training Stables)

Born 13th June 1961, Simon is a first generation trainer. Often considered to be the most forward thinking of workaholics, he still finds plenty of time to keep clients informed and entertained.

Simon was a committed athlete himself, having held the record over 800 metres as Surrey County champion, before directing his energies into horses and eventually the training of racehorses.

His career commenced when serving his apprenticeship as a lad, before quickly turning his attention to the business side of things. An opportunity to combine an Assistant Trainer's position with Philip Mitchell with his own small yard quickly led to bigger things and Simon moved to Epsom in 1987 to take over Wendover Stables, owned by Arthur Pitt.

Since moving to Clear Height Stables in the early 90s the stable has seen much success over the years recording in excess of 600 winners. This has been the result of a wide range of races, from local all-weather meetings, to black type victories at home and abroad.

The most successful horse so far was Young Ern who won the Group 3 Hungerford Stakes, the Group 3 Prix Du Palais Royale and was narrowly denied victory in a Group 1 at Deauville. The late, Chief Song won ten races and nearly £200,000 in prize money, would have been the most successful of our National Hunt runners. More recently, Simon sent Mr Scaramanga to Qatar to win the Group 2 Al Biddah Mile and Forceful Appeal won The Apprentice Handicap on All Weather Championship day.

Other horses that have progressed into multiple winners include Dark Honey, Confronter, Chakalak, Quantum Leap, Space Station, Clear Praise, Mustakmil, Seasonal Cross, Diamond Charlie, Poppanan and of late Forceful Appeal, El Campeon and Presumido. (Source simondow.co.uk).

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LOCAL PLAN EVIDENCE BASE: RETAIL NEEDS ASSESSMENT AND TOWN CENTRES HEALTH CHECKS

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annexe 1: Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks (January 2020)
Other available papers (not attached):	

Report summary

The Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks is a technical study commissioned by the Council to inform the emerging new Local Plan. This study relates to the provision of further retail floorspace provision and to provide an assessment of the health of our retail centres. The key findings are presented in this report in summary form.

The Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks is a technical assessment and forms part of the Council's evidence base for its emerging Local Plan policies.

Recommendation (s)

The Committee notes the contents of the Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks as a technical study that will form part of the evidence base for the emerging new Local Plan.

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

1.1 The Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks will form part of the evidence base for the emerging Local Plan policies. The delivery and implementation of the Epsom & Ewell Borough Local Plan will ensure sustainable growth is planned in the Borough to meet the Corporate Vision priorities and values

2 Background

2.1 The Council commissioned Urban Shape to undertake a borough-wide Retail and Commercial Leisure Needs Assessment. The purpose of the Assessment is to provide the Council with an up to date and comprehensive understanding of the current health and performance of the Borough's retail and leisure offer within the existing network of town centres, to set out current and future needs for additional floorspace and to inform a robust retail and town centre strategy.

2.2 The Assessment and Town Centre Health Checks will be used to inform the new Local Plan. They will also provide useful technical evidence that can be used to assist in the determination of planning applications for new development in the Borough. A copy of the Needs Assessment and Town Centre Health Checks is included under Annexe 1.

3 Proposals

3.1 The Assessment provides a thorough review of the national, sub-regional and local retail market. It includes both a qualitative and quantitative assessment of all of the retail centres which includes a household telephone survey, site surveys and analysis of external published data. The findings are detailed and comprehensive but have been briefly summarised by the bullet points below. These conclusions and recommendations will inform the retail policies in the draft Local Plan.

3.2 Conclusions

- The Town Centre has received substantial investment since Plan E
- The Epsom BID has been created resulting in more funding and investment
- The role of Epsom Town Centre within the network of larger sub-regional centres has improved and strengthened over the last ten years – clawing trade back from Kingston and Sutton and consolidating market share – a strong indicator of vitality and viability.
- The market share of all other centres in the borough has fallen– only Epsom has an enhanced market share, consolidating its position within its own catchment area.
- Major redevelopment schemes in Croydon and Guildford have stalled (due to the national economy and changing town centre requirements), whilst a scheme in Sutton is complete and has had little or no impact on Epsom Town Centre. Kingston is bringing forward the Eden Walk redevelopment and should be monitored, but the John Lewis click and collect at Waitrose Epsom has helped the Town Centre's trade retention and reduced the need to travel to Kingston so frequently.

- Stoneleigh Broadway is a strong performing town centre, and the use class mix in % terms remains healthy. There is strong customer loyalty. Main concern is the growth of non-use class A on the high street, now totalling 17 (Use Class B1 businesses) compared to just 5 in 2011.

- Ewell Village has a good mix of operators and a selection of specialist key attractors, however there has been a significant decline in retail businesses from 70 to 57 since 2011 with decline of A1 being most significant. A2 and A3 has grown, but vacancy remains low. Loss of retail activity around Cheam Road/High Street junction – separating the town centre in two. Location of Post Office and pharmacy in north of centre is key if this part of the town centre is to remain in active use.

- Waitrose / M&S town centre foodstores figures suggest they are under-performing but not significantly and this is likely to be topped up considerably by passing trade, employees in Epsom Town Centre and students etc. Small Tesco's and Co-Op's are substantially over-trading.

- Co-Op and Sainsbury's in Stoneleigh significantly over-trading; Co-op and Sainsbury's in Ewell over-trading, but more in line with expected company average sales densities. The assessment highlights the importance of the two convenience foodstores in both Ewell Village and Stoneleigh Broadway as being key anchors and identified footfall drivers that help maintain the vitality and viability of these centres.

3.3 Suggested Actions

- Retention of Primary and Secondary frontages – as suggested in Planning Guidance;

- Monitor consultation and government recommendations in respect of planning reform/permitted development. It is uncertain what a more relaxed Class A1 mean in reality. Policy can't respond without further detail at present, but the study will recommend an appropriate town centre mix across character areas;

- Lower the retail impact assessment threshold to a locally identified figure;

- Epsom Town Centre retail offer focused more on multi-dimensional retail, leisure, cultural and visitor offer – not under-playing the important role of A1 – key to competition with the internet;

- Retention of Use Class A category on Stoneleigh Broadway, and policy restriction on dead frontages and B1 offices;

- Retention of one consolidated shopping centre in Ewell and avoid further change of use away from retail and non-active frontages;

- Recommendations in respect of frontages and boundaries and need/development sites.

4 Financial and Manpower Implications

4.1 The Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks has been prepared within agreed budgets by external consultants Urban Shape.

4.2 In terms of internal resource implication, this has been in the project tendering and contracting of the service; followed by project management after the consultants had been appointed.

5 Legal Implications (including implications for matters relating to equality)

5.1 The Local Plan will be examined to assess that it has followed legal and procedural requirements and that it is 'Sound'. For the Plan to be considered Sound, it needs to meet the following tests:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

5.2 The Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks will inform the strategies and policies contained within the emerging new Local Plan in order to ensure that they meet the tests of soundness.

5.3 ***Monitoring Officer's comments:*** *none arising from the contents of this report.*

6 Sustainability Policy and Community Safety Implications

6.1 The new Local Plan will contribute towards delivering the Council's objectives and priorities.

6.2 Proposed policies are subject to a Sustainability Appraisal which is an integral part of the plan making process.

7 Partnerships

7.1 Local Planning Authorities have a duty to cooperate with public bodies on strategic planning issues that cross administrative boundaries.

7.2 Urban Shape have engaged with a wide range of partners and commercial interests in preparing the assessment report.

8 Risk Assessment

8.1 Insufficient evidence to support the new Local Plan policies may result in the Local Plan not meeting the test of Soundness of being positively prepared, justified, effective and consistent with national policy.

9 Conclusion and Recommendations

9.1 The Committee notes the contents of the Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks as a technical study that will form part of the evidence base for the emerging retail policies in the new Local Plan and be published on the Council's website.

Ward(s) affected: (All Wards);

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Retail and Commercial Leisure Needs Assessment

Epsom & Ewell Borough Council

Draft Report January 2020

urban shape
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Appendix 1 | National Market Context
Appendix 2 | Convenience Goods Need Assessment
Appendix 3 | Comparison Goods Need Assessment

1. Introduction

1.1 Urban Shape are instructed by Epsom & Ewell Borough Council ('the Council') to undertake a borough-wide Retail and Commercial Leisure Needs Assessment. The purpose of the assessment is to provide the Council with an up-to-date and comprehensive understanding of the current health and performance of the Borough's retail and leisure offer within the existing network of town centres, to set out current and future needs for additional floorspace to the period 2032, and to inform the preparation of a robust retail and town centre strategy.

1.2 This evidence base study will be used by the Council to inform the emerging Epsom & Ewell Local Plan which will guide development in the Borough until 2037. The new Local Plan will replace the Core Strategy (2007), Plan E (Epsom Town Centre Area Action Plan 2011) and the Development Management Policies DPD (2015). The Assessment will also remain at the Council's disposal to assist in the determination of planning applications for new development in the Borough.

1.3 Our terms of reference are to:

- Establish the extent to which the current retail and leisure provision in the borough satisfies the level and nature of consumer demand within the catchment – both qualitatively and quantitatively;
- Identify the scale and nature of additional convenience and comparison retail provision that may be appropriate across the borough to the period 2032, taking into consideration changes to population and forecast retail expenditure;
- Assess the scope for new retail and leisure development and the potential to accommodate this within the borough through a recommended town centre strategy;
- Assess the appropriateness of the existing development plan policy approach for retail and main town centre uses across the Borough in order to inform emerging policies for the new Local Plan.

1.4 In addition to on-site and desk-based research, this report is informed by a new and up-to-date Household Telephone Survey covering 1,200 households across 12 survey zones (Plan 1). Urban Shape designed the survey questionnaire in consultation with Epsom & Ewell Borough Council and NEMS Market Research who undertook the interviewing and data processing in August/September 2019. The survey area is consistent with that used to inform the previous Epsom & Ewell Retail Need Assessments undertaken in 2009 and 2015, enabling direct comparisons to be made and trends identified.

Report Structure

1.5 The report is structured as follows:

- **Section 2** summarises the national, strategic and local planning policies relevant to retail and town centre uses in Epsom & Ewell Borough.
- **Section 3** considers national trends in the retail sector, and in particular the implications of economic fluctuations and technological advances which are impacting on shopping habits.
- **Section 4** considers the wider sub-regional context, analysing trends in market share/trade draw and future investment plans which might have implications on the future performance of Epsom Town Centre.
- **Section 5** reviews the composition, role and function of Epsom Town Centre, drawing on on-site surveys, published data, and the outputs from the Household Telephone Survey.
- **Section 6 and 7** provide health check assessments of Ewell Village and Stoneleigh Broadway District Centres;

- **Section 8** sets out the quantitative 'need' for additional convenience and comparison goods retail floorspace in Epsom until 2032 (the Plan period);
- **Section 9** draws the analysis together and sets out our conclusions and recommendations in respect of the current health and composition of the borough's main town centres, the need and opportunities for further growth, the appropriateness of town centre boundaries and frontages, and the robustness of retail and town centre policies.

2. Policy Framework

National Planning Policy Framework (2019)

2.1 The most up-to-date National Planning Policy Framework (NPPF) was published on 19 February 2019. The document sets out the Government's presumption in favour of sustainable development, and confirms that the planning system should be genuinely plan-led. Succinct and up-to-date plans are required to provide a positive vision for the future of each area, and the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Local plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.

2.2 Section 7 seeks to ensure the vitality of town centres, emphasising that planning policies and decisions should support the role that town centres play at the heart of local communities. A positive approach should be taken to their growth, management and adaptation. Planning policies are encouraged to seek a series of outcomes relating to the long-term vitality and viability of the hierarchy of town centres, and the extent of primary shopping areas and the location of development opportunity sites. The NPPF states that planning policies should also recognised the benefits of residential development and town centre living.

2.3 In order to be considered 'sound', Local Plans should be positively prepared, justified, deliverable and consistent with national policy. The NPPF is a material consideration in planning decisions.

2.4 In respect of Development Management, paragraph 86 of the NPPF (as revised) states that a sequential assessment is required for planning applications for 'main town centre uses' (which include retail) that are not in an existing centre and are not in accordance with an up to date Local Plan. Applications for main town centre uses should be located in town centre locations, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. Paragraph 87 adds that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.

2.5 Paragraph 89 of the NPPF confirms that when assessing applications for retail and leisure development outside of town centres, which are not in accordance with an up-to-date development plan, LPAs should require an impact assessment if the development is over a proportionate, locally set threshold. If there is no locally set floorspace threshold, the default threshold is 2,500 sq m of gross floorspace. Impact assessments are required to assess:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

2.6 The NPPF directs that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.

Planning Practice Guidance (PPG) (2014)

2.7 In March 2014 the Department for Communities and Local Government (DCLG) launched online Planning Practice Guidance (PPG). It was last updated on 22 July 2019. Although it does not constitute a statement of Government policy, it provides technical guidance on how to prepare a robust evidence base and how to assess the impact of proposals for main town centre uses. The web-based resource also provides guidance on how to assess and plan to meet the needs of main town centre uses in full through production of a positive vision or strategy for town centres.

2.8 The guidance provides additional detail on applying the sequential and impact test, and whilst the NPPF has removed reference to shopping 'frontages', the PPG confirms that authorities may, where appropriate, wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres. These frontage allocations would be in addition to Primary Shopping Areas.

The Development Plan

Core Strategy 2007

2.9 The Core Strategy identifies the key issues and the social, environmental objectives for the future development of the Borough up to 2022, and a strategy to achieve them. The document recognises that Epsom Town Centre provides a good range and choice of facilities and caters for a wide range of needs. The document states that maintaining the vitality and attractiveness of the Town Centre is key to delivering sustainable development and to maintaining and improving the quality of life of the Borough's residents. The document emphasises that:

> *"..the Council is therefore committed to a positive and pro-active approach to town centre development and change. Its aim is to ensure that the town reaches its full potential to provide the essential range of services and facilities required, in an attractive environment that is easily accessible by all modes of transport." (para.3.19.1)*

2.10 As part of the Council's overall vision for the future of Epsom town centre, the Core Strategy seeks a vibrant, healthy and safe shopping environment, combined with a high-quality townscape. In terms of offer, the vision aims for improved retail attractions, increasing the range of types and form of shops and other high street facilities and services. The strategy also seeks to secure thriving day-time and night-time economies.

2.11 The strategy encourages focus on other key areas including the range and quality of cultural, leisure, social and visitor attractions; improved public transport links; reducing the detrimental impact of vehicular traffic; encouraging a variety of housing; sensitivity to the character and conservation importance of the town centre; and improving the sense of safety and security.

2.12 Paragraph 3.19.3 emphasises that the approach will be to focus and promote a variety of uses within the Town Centre, provided their impact reinforces this vision and can be accommodated without harm to the local community or to its townscape character. Policy CS14 outlines the broad policy context within which further detailed policy development can take place. In addition, the document notes the Council's next steps to prepare a more detailed Area Action Plan for the town centre, to provide the framework for future change, identify development opportunities and facilitate the changes necessary to promote its vitality and viability.

Plan E 2011: Area Action Plan for the Town Centre

2.13 In accordance with proposals set out in the Core Strategy (2007), the Council prepared Plan E (2011) in close association with representatives from the local statutory, voluntary, community and private sectors. As the main town centre in the borough, Epsom plays a vital role in the community, and the importance of maintaining a vibrant and vital town centre is widely recognised.

2.14 Plan E is a strategic policy document which provides a detailed vision for the future of Epsom Town Centre. It maps out a way forward for the town centre over the next 15 to 20 years, establishing a framework to show how change will take place, how it will be managed, and how it will be delivered. The document is based on the understanding that Epsom Town Centre does not require significant change or regeneration, and rather the focus should be on effectively managing what already exists, while making the most of opportunity sites.

2.15 Plan E sets a vision for each of the key areas throughout the Town Centre, and can be summarised as follows:

- The Old Town and Market Place: The functional heart of the town centre, and the focus for an exciting mix of street-based activities. West Street and South Street will be the focus of high-quality independent shops and restaurants. Promotion of continuous improvements to its appearance;
- The High Street (East): To be reborn as a traditional-style high street shopping environment, reflecting its history as a historic 1930's shopping parade. It will remain the link between the retail heart and specialist/niche retailing on Upper High Street. Derby Square (now part of the Epsom Square site) will be a place for people to meet, eat and drink;
- Upper High Street/Upper Town: The areas historic built environment will be protected and enhanced, and it will be home to high quality and niche retailers, family-friendly restaurants and other leisure activities, including the cinema;
- Ashley Centre and Ashley Avenue: Will continue to be home to a mix of quality national retailers and will have improved pedestrian links to adjoining areas of the Town Centre;
- East Street: The main business district for both Epsom and the wider Borough, with a mix of small shops and other commercial uses;
- Epsom Railway Station and Station Approach: Epsom Station will be redeveloped to provide a mix of uses including a greatly improved station concourse and new housing.

2.16 The remainder of the document sets out how Plan E will achieve the vision. Of particular relevance to this study are Policies E1, E3 and E4. Policy E1 identifies the Town Centre Boundary, and Policy E3 confirms the ambition to maintain Epsom's position as a secondary regional centre, with a retail offer reflecting that of a quality market town. The policy confirms that, based on the 2009 GVA Retail Study, there is need for an additional 2,466 sq m convenience goods floorspace by 2026. For comparison goods, Policy E3 sets out capacity for an additional 7,730 sq m by 2026.

2.17 Policy E4 confirms that the percentage of A1 uses within the Primary Shopping Frontages should not fall below 66%, and uses other than A1/2/3 will not be permitted. Within Secondary Retail Frontages, Use Classes A1/2/3 will be permitted, but A5 uses will not be permitted. Other uses will only be permitted provided they demonstrate compliance with a number of criteria listed.

2.18 Section 5 focuses on 'Opportunity Sites' which have the ability to help realise the vision, with three 'Strategic Opportunity Sites' being identified. These include:

- Depot Road and Upper High Street (Policy E14): A mixed use site including 2,000 sq m of retail floorspace that will allow for a mix of small retail units and a small-medium sized foodstore. A Development Brief (2012) has been prepared for this site [***unimplemented***];
- The Utilities Site (Policy E15): A mixed use site primarily identified for housing and employment;
- Epsom Station Site (Policy E16): Redevelopment of Epsom Station, with additional mix of uses including residential, commercial and a maximum of 1,000 sq m of ground floor retail provision, which could include a café or restaurant [***now implemented***].

2.19 Policy E17 identifies a number of smaller sites allocated for redevelopment which will contribute towards meeting Plan E's wider objectives:

- Market Place, High Street
- Former Woolworths Store, High Street
- Pickard House, Upper High Street
- Former Magistrates and County Court site, The Parade/Ashley Road

- Global House, Ashley Avenue
- TK Maxx Store, High Street
- Emergency Service Uses, Church Street
- Comrades Club, The Parade
- Land to rear of The Albion Public House, South Street
- Town Hall Square and car park, rear of Town Hall

Development Management Policies Document (DMPD) (2015)

2.20 The Development Management Policies Document (DMPD) was adopted in September 2015. The purpose of the Development Management Policies Document is to both support the strategic objectives and deliver the vision of the Core Strategy, and to set criteria by which planning applications and site allocations will be considered and determined.

2.21 DM28, DM29, DM30, DM31 are relevant to 'Retail Uses', underpinned by a town centres first approach. Policy DM28 aims to protect existing retail centres outside Epsom Town Centre, resisting change of use from A1, and with the overall percentage not falling below 50%. Along identified Primary Retail Frontages, the percentage of A1 units is protected to remain above 66%.

2.22 In order to deliver the Council's town centre first approach the document seeks to limit opportunities for further retail development outside of Epsom Town Centre and the Borough's other retail centres. Policy DM29 focuses major new retail developments (defined as being equal to or in excess of 2,500 sqm gross floorspace) towards Epsom Town Centre in the first instance, followed by Epsom Town Centre edge of centre sites, and then within the Borough's other centres which are in locations accessible by a choice of means of transport.

2.23 Neither the Core Strategy nor DMPD identify a local floorspace threshold for the assessment of retail impact. Impact assessments are only required, therefore, for development proposals above the national NPPF default threshold of 2,500 sq m gross floorspace.

2.24 Policy DM30 sets a series of criteria with which to assess proposals to extend or improve existing out of centre retail facilities (Kiln Lane, and Ewell By-pass, Ewell); whilst Policy DM31 safeguards isolated shops and small groups of shops which serve local needs.

Other Relevant Publications

Planning Reform Consultation, October 2018

2.25 In October 2018, Government published a consultation into a series of proposed planning reforms designed to speed up and simplify the planning system; the focus of which was on supporting the high street and increasing the delivery of new homes. The consultation recognised the changing and evolving nature of high streets and town centres across the country, and invited responses on a variety of development management methods which Councils could use to promote greater flexibility.

2.26 Part 1 of the consultation includes proposals in respect of new and amended Permitted Development (PD) rights and changes to use classes, including to support the regeneration of the high street and to extend existing buildings upwards to create new homes. Government is proposing new PD rights to allow existing premises in typical high street uses to change to a wider range of uses, allowing more leisure and community uses such as gyms, libraries, health care and office use as well as homes.

2.27 With the rise of internet shopping, and the change in how people use the high street, the consultation highlights that it is timely to consider how the operation of the Use Classes Order can support greater flexibility. It notes the need to support the modernisation of the high street and enable businesses to

adapt to changes in consumer demands. The changes to PD and use class order which were consulted on can be summarised as follows:

- Allowing class A1, A2, A5, betting shops (SG), payday loan shops (SG) and laundrettes (SG) to change to class B1 (office) use under PD;
- Allowing class A5 to change to class C3 (residential) under PD;
- Ensuring that the A1 (retail) use classification remains modern and current (i.e. whether the current range of goods listed as class A1 use remained fit for purpose); and
- Replacing A1, A2 and A3 with a single use class to cover shops, financial & professional services, restaurants and cafes.

2.28 Government published their response to the consultation in May 2019. This confirmed the intention to proceed and implement the first three bullet points above, but to move away from a suggested single use class which would merge A1, A2 and A3. The government response paper stated that 'more than half of the 276 responses to question 1.7 agreed that changes to the A use classes would support the high street [and] there was considerable support to simplify the A1 use class to accommodate new and emerging retail models. There was, however, concern that:

> "…merging the A1, A2 and A3 use classes would enable change to restaurant use without any local consideration of the potential impacts from longer opening hours and increased noise and odours. It could lead to a proliferation and increased concentration of restaurants, including fast food restaurants, in an area with an impact on the health of local residents and local amenity. There was also a concern that it would limit the ability of local communities to shape their high streets as set out in local or neighbourhood plans."

2.29 Further clarification on all points are yet to be published, including reference to the prior approval of certain planning impacts. It is evident, however, that Government are intending to move towards a more flexible policy approach to the high street, particularly regarding modern business formats and the acceptance of ancillary uses within A1 shop units.

The High Street Report & Future High Streets Fund (2018)

2.30 In December 2018, the Government published 'The High Street Report', setting out the findings of the 'High Streets Expert Panel' which was established earlier in 2018. The Panel sought to identify the key issues facing high streets and town centres, and advise on the best practical measures which the Government can take to help.

2.31 The publication of the Report followed on from the announcement in the budget of Autumn 2018 of a £675m 'Future High Streets Fund', set up to help local areas respond and adapt to the changes facing town centres. The Fund will support local areas in preparing long term strategies for town centres, including funding a new High Streets Task Force to provide expertise and support to local areas. It will also co-fund investment projects in town centres, either in the form of physical infrastructure (including the regeneration of heritage high streets) or investment in land assembly, for example to support the densification of residential and workspace in town centres in place of under-used retail units.

2.32 The High Street Report provided recommendations on how the above measures should best be implemented to ensure town centres could maximise benefits:

- Making the Task Force the 'single voice' for town centres; facilitating cross-sector networking and skills building; and act as provider of access to expert help and support.

- That the Future High Streets Fund should interact with the Task Force to increase the impact of both; should fund places with community involvement in their town centre; and fund towns that demonstrate a clear vision and cross-sector leadership.
- In addition the report recommended a number of additional interventions to help facilitate town centre revitalisation, including that towns should improve the 'housekeeping' of their town centres, including creation of a 'National High Street Perfect Day'; that local authorities should 'use initiative' to encourage landlords and tenants to think innovatively about how to use empty properties; and that towns should ensure that parking restrictions/charges are not discouraging town centre use.

2.33 Alongside the High Street Report, a second report 'High Street 2030: Achieving Change' was published, setting out the findings of workshops undertaken by the Institute of Place Management to collect evidence to support the development of town centre policy.

Summary

- The NPPF advocates a 'town centres first' approach, and requires planning policies to positively promote competitive town centre environments and manage the growth of centres over the plan period. The NPPF encourages LPA's to recognise that town centres are the heart of their communities and to pursue policies which protect their health and vitality and positively seek opportunities to meet the development needs of their area.
- The NPPF focuses on Primary Shopping Areas, removing reference to Primary and Secondary Frontages, but the PPG confirms that such allocations remain useful tools if desired in supporting the vitality and viability of town centres.
- The Development Plan confirms the Council's commitment to a positive and pro-active approach to town centre development and change, seeking to improve retail attractions, and increase the range and types of shop and other high street facilities and services. A Core Strategy commitment to the preparation of a more detailed Area Action Plan (AAP) led to the adoption of Plan E 2011, an AAP for Epsom Town Centre.
- Plan E emphasised that Epsom Town Centre does not require significant change or regeneration, but rather a focus on effectively managing what already exists and making the most of opportunity sites. The document identified a series of key character areas within a defined town centre boundary and – together with the Development Management Policies Document – set an A1 minimum threshold of 66% of units within the Primary Shopping Frontage, and 50% within the Town Centre Boundary.
- Key development opportunity sites were identified in Plan E including Depot Road/Upper High Street, The Utilities site, and Epsom Station, one of which has now been implemented (Epsom Station) and one part implemented (Utilities site). When considering development proposals, the development plan does not fix a locally set retail impact floorspace threshold and by default refers decision makers to the national NPPF threshold of 2,500 sq m gross.
- Recent consultation on proposed planning reform (2018) highlights the government's intention to move towards a more flexible policy approach to the high street, recognising modern business formats and emerging retail models within A1 shop units. The government response paper suggests, however, that they are unlikely to move towards a merged Use Class A category in order to retain a level of planning control to shape high streets.

3. National Market Context

3.1 Trends in the retail and leisure sector influence how people use town centres. In turn, these have important implications on the formulation of planning and spatial strategies and the future vitality and viability of each individual town centre across the UK. Appendix 1 provides a detailed discussion of the subject trends, and we provide a high-level summary in this section, drawing out the key points of relevance for town centre planning in Epsom & Ewell.

3.2 Trends in recent years have been well documented. They broadly relate to global economic fluctuations, growth in on-line shopping/multi-channel retailing; changes in the property and space requirements of retail operators; evolution towards multi-dimensional town centres and the growth of the commercial leisure sector; and changes in the convenience goods sector with the growth in discount retailers and more varied food shopping habits. Sectoral analysis and published evidence confirm that town centres will need to continue to evolve and adapt to remain vital and viable locations.

The Evolving Role of the Town Centre

3.3 Retail will continue to be a vitally important footfall driver in town centres, and should not be swept aside in favour of alternative town centre uses. Whilst town centres are evolving, the role of retail and retail operators should be central to any town centre strategy moving forwards. Nevertheless, trends and the need to inject life into our high streets have introduced new, multi-dimensional elements to town centres which should be promoted and incorporated – alongside retail – into emerging town centre strategies. These can be summarised as follows:

- The development of an **'experience'** for visitors who are increasing seeking to combine retail and leisure activities as part of a single 'going out' trip. Town centres much provide an attractive experience for visitors which the internet is unable to match. This might include specialist markets, independent cinemas, street food and seasonal events, for example.
- Town centres acting as genuine **hubs for their communities**, and the need to create a vibrant social, commercial and cultural destination. Uses might include cultural space, co-working space, space for small and medium-sized enterprises (SME's), community facilities including libraries, education space, community halls/meeting venues.
- Growth in **town centre living** and residential space/student accommodation – delivering footfall in the evenings and at weekends as well as during the daytime. A town centre strategy will require consideration of noise, environmental health and licensing hours in order to consider residential amenity alongside a supported evening economy.

3.4 An enhanced and multi-dimensional town centre strategy will require a co-ordinated and joined-up approach from all key parties in Epsom, including the Council, operators, shopping centre owners, market traders, and organisations such as the Epsom BID. Section 5, 6 and 7 of this report sets out details of identified trends in Epsom, Ewell Village and Stoneleigh Broadway, enabling informed conclusions as to what more is required in the future.

Economic Trends

3.5 Since the Epsom & Ewell 2015 Retail Update was published, the UK's decision to leave the European Union has become an influencing factor in forecasts of economic growth. This has led to short term uncertainty impacting consumer confidence and spending, with direct consequent impacts on forecast expenditure growth rates for both convenience and comparison goods. This is reflected in Section 8 when forecasting need for future retail floorspace. The medium/longer-term outlook has depended very much on whether a soft Brexit (i.e. access to the single market) or a hard/no deal Brexit is struck – or indeed whether a deal can be struck at all.

3.6 The recent general election in December 2019, and resulting Conservative party majority, provides more certainty that a deal will be made at the earliest opportunity and that the UK will leave the European Union. This political stance does provide a greater degree of economic certainty over a shorter time period, but the implications of a Brexit deal and associated timescales will need to be monitored over the coming weeks and months.

Online and Multi-Channel Retailing

3.7 Online shopping has become a firmly established method of shopping. Evidence demonstrates the continued growth of this sector in terms of those that have internet access, those that use the internet everyday, the methods and modes used to undertake such transactions, and the breadth of the population taking advantage of what is on offer, with the largest rise in the 65+ age group in recent years.

3.8 Considerable amounts of spend are now being diverted online, which is spend lost from 'bricks and mortar' town centre stores. The most popular categories are clothes and sports goods, followed by household goods, holiday accommodation, tickets for events, travel arrangements, and films and music. Four out of these six goods categories are those which have historically been purchased through physical high street stores, and the shift of spending to online platforms has resulted in a number of operators ceasing to trade or reducing their network.

3.9 The associated challenges for high street operators, coupled with often high levels of business rates and rental agreements, are clear to see. The overall picture reflects mixed fortunes with winners and losers on the high street with those operators at the middle to value end of the market – including Primark/H&M/Sports Direct/TK Maxx – recording strong performance levels.

3.10 Importantly for town centres, it has been evidenced that only 15% of online shoppers buy all of their fashion items online, with the remaining 85% using both online and physical stores. This highlights the importance of having a 'joined-up' town centre 'experience' to lure shoppers away from the internet and instead to visit the high street and to extend their dwell time through a range of retail and leisure attractions.

Click and Collect

3.11 Research indicates that the click and collect market will grow by a further 46% by 2023. Click and collect allows a shopper to order and pay for a product online, and then have it delivered to the nearest physical retail store of that operator. This is an important opportunity for town centres, as it can act as a footfall generator in its own right. Research demonstrates that 39% of consumers make an additional purchase in that town centre when collecting an item from a store.

3.12 In Epsom, shoppers can pick up John Lewis orders from Waitrose in the Ashley Shopping Centre, thus avoiding trip journeys to Kingston upon Thames. John Lewis state on their website press releases that "in the last five years alone, Click & Collect orders have increased more than 50% as customers enjoy the ease and convenience it provides. Currently 57% of all online orders are delivered through this service with 25% of packages collected at John Lewis shops and 75% at Waitrose shops". This recent trend is likely to have had a direct positive impact on Epsom Town Centre.

3.13 A threat to the continued growth of click and collect is the rise of instant delivery and saver delivery services, as businesses aim to match efficient delivery options and consumer expectations. This includes same day delivery, one-hour delivery windows, and delivery passes whereby a consumer pays an annual subscription to guarantee same day, next day or timeslot delivery options. The impact of this on click and collect and associated opportunities for town centres will need to be monitored.

Commercial Leisure Sector

3.14 In recent years, the commercial leisure sector has played an increasingly important role in the vitality and viability of town centres, as the nature of town centres continues to evolve. In many new town

centre schemes, a cinema or family/casual dining has replaced retail as the 'anchor', driven by the growth of this sector and the need for town centres to generate a more varied visitor experience. There are signs, however, that the casual dining sector is reaching saturation and increased competition is leading to casualties. Analysts suggest that in addition to market saturation, the rise in food costs, staff costs, rents and business rates have all impacted on operators' profits.

The Convenience Sector

3.15 The trends being experienced in the food retailing sector were established to varying degrees at the time of the 2015 Retail Study update. Food superstores are experiencing a decline in market share, small format stores of the market leaders are gaining market share, discount retailers – Aldi and Lidl – are achieving strong growth, and on-line spend is continuing to grow although not to the same extent of non-food shopping. The market leaders have pulled back on large superstore openings, and whilst small convenience stores continue to open this is not at the same pace as that seen in recent years.

Banks and Financial

3.16 The services of the high street banks have traditionally been delivered through their branch networks, meaning that in centres at all levels in the hierarchy, the presence of a wide range of banks and building societies formed an important part of a centre's mix of uses. The numbers of bank branches in the UK have been in decline for the past thirty years, due to a variety of reasons including the desire by banks to cut costs; mergers within the industry; competitive pressures from new entrants in the banking sector; changes in the nature of retail banking transactions; and a growth in alternative means of accessing bank services, particularly driven by technological advances such as online and mobile banking.

3.17 According to research from CACI[1], customer visits to retail bank branches are forecast to drop by 36% between 2017 and 2022, with mobile transactions rising 121% in the same period. CACI estimate that the typical person will visit a retail bank branch just four times a year, down from seven in 2017. Most banks have an alliance with the Post Office (whose own branch network has remained relatively stable in recent years), meaning that in most smaller centres there are still banking facilities available to those who are not able to use alternative means. However, the decline of bank branches has also served to free up large, often historic and listed commercial premises in central town centre locations, which are in some instances challenging to let.

Out-of-Centre Retailing

3.18 Out-of-centre retailing offers the benefits of lower rents, larger retail units and in most cases, free car parking. According to Verdict (national retail intelligence and trend analysts), out-of-town retailing is the only form of retailing which has seen store numbers increase consistently since 2000. The Department for Business, Innovation and Skills reports that the number of out-of-centre stores has increased by up to c.1,800 (25%) since 2000.

3.19 The recovery of market confidence which took place since 2013 benefited out-of-town retailing. Vacancy rates fell, footfall has increased, and many retailers are seeking expansion in out-of-centre locations. Some traditional town centre retailers which have developed out-of-town store formats, including John Lewis, which now operates a number of 'At Home' stores in prominent out-of-centre locations, as well as other traditionally 'high street'-focussed retailers such as Debenhams, Next, Primark and H&M.

3.20 Epsom & Ewell Borough has relatively limited retail warehouse provision, with the exception of two retail warehouse units – currently occupied by Wickes and Halfords – on Kiln Lane in Epsom, adjacent to the large out-of-centre Sainsbury's supermarket. However, there are large concentrations of retail warehousing at Purley Way, Croydon (which includes one of London's three IKEA stores, as well as a

[1] Analytical research company, providing operator trend data.

John Lewis at Home and several home/furniture stores) and at Shannon Corner, New Malden, both of which are easily accessible to many residents of the Borough (although less so by public transport).

Summary

- Today, the success of town centres is less reliant on traditional retail floorspace, instead becoming more focused on ensuring a multi-dimensional offer and the creation of a visitor experience of sufficient quality to compete with internet sales.
- The town centre market has been challenging in recent years, as the UK comes to terms with and explores the means with which to leave the European Union. Associated economic uncertainty has led to a more reserved level of consumer spending, and this, alongside the growth in online spending, competition for click and collect, and a saturated casual dining experience, the high street has been hit hard.
- For Epsom, the retention of retail floorspace and the creation of a more diverse leisure and visitor economy will be key to consolidate its position in the sub-regional network of centres performing the role of a larger town centre.

4. Sub-Regional Context

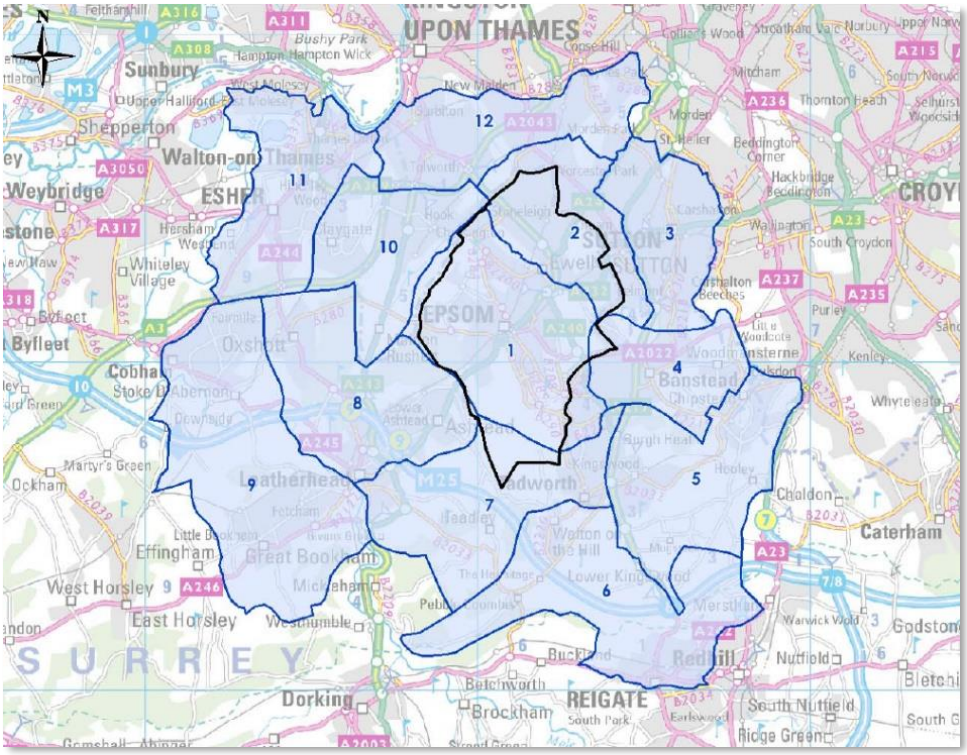
4.1 The 2009 Retail Study examined the retail performance of Epsom Town Centre in the context of the retail network across the wider sub-region. The analysis focused on the shopping catchment, trade flows, the profile of competing centres, and a detailed town centre health check of Epsom. The 2015 Retail Study Update set out how the retail context had since changed including a review of pipeline development in key competing centres. This section summarises those findings and provides an up-to-date analysis of the sub-regional context based on a newly commissioned Household Telephone Survey.

4.2 Each competing shopping destination will draw a proportion of trade from the survey area/Epsom's catchment area. Boroughs are not 'closed systems' and there will be inflows and outflows of expenditure. It is not realistic to expect 100% trade retention with a borough, but it is a useful tool to understand the strength of different centres, where the key parts of a catchment are located, the opportunities to enhance trade draw, and to assess over time trends in market shares – either improvement or decline. The analysis provides an in-depth insight into the performance and vitality and viability of a town centre.

Household Telephone Survey

4.3 The survey area defining the focus of the past (2009 and 2015 update) and current (2019) analysis is shown below in Figure 4.1, and comprises 12 Survey Zones. A new household telephone survey was undertaken in August 2019 across 1,200 households capturing data on shopping patterns, socio-economic profiling, and qualitative strengths, weaknesses and opportunities. Analysis of the outputs enables us to understand shopping patterns for food and non-food goods, the trade draw of each respective town centre and out-of-centre destination across the catchment area, and a comparison of the performance of each across the sub-region.

Figures 4.1: Household Telephone Survey Area 2008 & 2019



NB: Household Telephone Surveys undertaken in 2008 and 2019

Shopping Catchment 2009 Retail Study

4.4 The 2009 study identified that Epsom's catchment profile is affluent and has a strong family bias. Drawing on evidence provided by the Council at that time, there was a very high presence of Wealthy Executives and Prosperous Professionals, typical of Surrey residents. On that basis, it was concluded that this highly affluent catchment may be able to support a premium-market retail sector amongst its retail mix. The 2015 Update considered that position to have remained unchanged, reflected in the implementation of the affluent Hospital Cluster housing development and continued strong house price rises.

4.5 In terms of the sub-regional context, the 2009 Study identified Banstead, Croydon, Guildford, Kingston-upon-Thames, Leatherhead, New Malden and Sutton as Epsom's main competing centres. The review of key performance indicators in 2009 confirmed the higher order shopping roles of Kingston, Croydon, Guildford and Sutton, offering a more extensive and therefore superior retail offer to Epsom.

4.6 In terms of 2009 catchment dominance, Kingston and Sutton presented the strongest influence on shopping patterns, drawing 28.4% and 16.0% of available comparison goods trade from Zones 1-12. Epsom was performing well for a centre occupying a lower position in the sub-regional retail hierarchy, attracting 6.6% of total available comparison goods expenditure from across the survey area. It was concluded in 2009 that Epsom exerts much influence over the central and southwestern parts of the survey area demonstrating an established and loyal shopper base.

Shopping Catchment 2019

4.7 Despite a tentative economy and more stagnant house prices in recent years, the overall conclusion in respect of levels of affluence across Epsom & Ewell Borough remains broadly similar in 2019 when compared to the 2015 Study. This is evidenced in the most recent Coast2Capital Local Industrial Strategy (LIS) (Draft, September 2019)[2]. The draft report identifies that Epsom & Ewell has the highest proportion of people (within Coast2Capital) in higher level occupations within the 'Managers, Directors and Senior Officials' category. The evidence sets out that higher incomes in Epsom & Ewell are assisted by London commuting levels, and the borough has one of the highest number of new business growth rates, recorded as being higher than the 'England average'.

Figure 4.1: Local Industrial Strategy (LIS) Study Area



[2] Coast2Capital.org.uk Draft Report LIS Economic Report prepared in September 2019 by Hatch.

4.8 Consistent with the 2009 Retail Study, the recently completed up-to-date household telephone survey (2019) enables us to examine the performance of Epsom town centre in the context of the retail network across the wider sub-region, examining the influence of key competing strategic centres on the current and future role of the Borough's retail hierarchy. The analysis draws extensively on the survey data, and qualitative desk-based research has been undertaken to establish major pipeline development proposals in competing centres.

4.9 Shopping patterns from the survey allow us to calculate the amount of comparison goods expenditure that each competing centre draws from the survey area. This indicator takes into consideration the strength of the retail offer as well as the centre's accessibility and distance from Epsom. The total amount of expenditure flowing to these centres is set out in Table 4.1, below.

4.10 Epsom is located most central to the survey area, drawing £216.9m of comparison goods expenditure (10.5%) from Zones 1-12; this is a 3.9% market share (£124.4m) increase over the last 11 years (since the 2008 survey) and is a particularly strong vitality indicator for Epsom in 2019. The town centre achieves its greatest market share in Zones 1 (37.3%), Zone 7 (27.7%), Zone 8 (21.4%), Zone 2 (14.1%), and Zone 4 (13.9%). This area reflects Epsom's core catchment area, with all zones adjoining central Zone 1 – Epsom's location zone.

4.11 The market share of all competing centres – aside from Guildford, which has remained static – has fallen. The analysis demonstrates the success of Epsom town centre in consolidating its town centre offer and becoming a more attractive destination for people to shop; a centre of choice for more people than that identified in 2008. This is likely to be a reflection of an improved retail offer over the last 10 years, the growth in click and collect and the ability to access a greater range and depth of goods in the 'local' town centre – Epsom, and in particular the introduction of John Lewis click and collect from Waitrose in Epsom Town Centre, thus avoiding the need to travel to Kingston for this key high street operator.

Table 4.1: Survey Area Comparison Goods Trade Draw: Key Competing Centres

	2009 Trade Draw (£m)	2009 Trade Draw (%)	2019 Trade Draw (£m)	2019 Trade Draw (%)
Kingston-upon-Thames Town Centre	£401.2m	28.4%	£521.8m	25.4%
Sutton Town Centre	£225.5m	16.0%	£256.5m	12.5%
Epsom Town Centre	£92.5m	6.6%	£216.9m	10.5%
New Malden Retail Warehousing	-	-	£171.6m	8.3%
Purley Way, Croydon Retail Warehousing	-	-	£134.5m	6.5%
Guildford Town Centre	£40.9m	2.9%	£59.1m	2.9%
Leatherhead Town Centre	£28.5m	2.0%	£37.3m	1.8%
Central London	-	-	£30.9m	1.5%
Reigate Town Centre	-	-	£28.4m	1.4%
Banstead Town Centre	£18.6m	1.3%	£23.4m	1.1%
Croydon Town Centre	£41.3m	2.9%	£17.2m	0.8%
Redhill Town Centre	-	-	£17.3m	0.8%

4.12 This improved strength in positioning has come at the expense of the other competing centres, including Kingston which has seen its market share within Zones 1-12 falling from 28.4% to 25.4%, and Sutton which has experienced a fall in market share from 16% to 12.5%. Kingston and Sutton are the two key centres drawing the highest proportion of trade from the survey area/Epsom's catchment area. Over the last 11 years Epsom has consolidated its position, clawing back trade previously lost to these shopping destinations.

4.13 Leatherhead and Banstead have experienced a small fall in market share, but the market share of Croydon town centre has experienced a more substantial decline from 2.9% to 0.8%. Reigate and Redhill have been introduced to the analysis demonstrating their area of influence primarily in Zone 6 – their location zone being some distance south of Epsom. These destinations on the outskirts of the survey area help to explain the 'cut-off' in Epsom Town Centre's catchment area and provide the reason for a lower market share in these outer survey zones.

Competing Centres – Pipeline Development

4.14 The above analysis sets Epsom in context at a 'point in time', i.e. presenting the current relationship with the surrounding network of town centres and retail shopping destinations. We have taken this a stage further to review developments in the pipeline in competing centres to assess the likely increase in trade draw as a consequence of a new and improved shopping experience. In summary, the review explores future risk to Epsom retaining current levels of market share, or inversely the opportunity for Epsom to continue to improve market share over the next 10 years consistent with past trends.

4.15 The 2015 Retail Study update identified the following key planning commitments:

- **Croydon**: Planning permission was granted in February 2014 for the comprehensive redevelopment of the Whitgift shopping centre and surrounding land. The scheme would comprise over 150,000 sq m (1.6m sq ft) of retail and leisure floorspace, and completion was expected – at that time – in 2018. The proposals, by Westfield/Hammerson, would be comparable in scale to Westfield West London and Westfield Stratford City.
- **Guildford**: Property investor, PRUPIM, had become the sole freehold owner of the Friary Shopping Centre, and Land Securities had been appointed the Council's development partner for the North Street site. The Council were working with both partners to bring forward new town centre/retail development on the North Street site, with linkages/integration with the Friary Shopping Centre. There were no fixed timescales at that time.
- **Kingston**: The Eden Quarter was identified as the key town centre development opportunity, and the associated Development Brief had been adopted in March 2015. The principle aim – at that time – was the expansion of Kingston's retail offer and the delivery of a mix of shop units, convenience retailing and restaurant uses. The expectation was the delivery of up to 30,000 sq m of retail floorspace.
- **Sutton**: In early 2014 plans for a large-scale mixed use development on the gas holder site in Sutton were approved, leading to the regeneration of the northern part of the town centre. In terms of retail, the scheme included a new Sainsbury's superstore and nine unit shops.

4.16 The redevelopment scheme in **Croydon** continues to move forwards although scheme composition is evolving in response to national trends. In November 2017, Croydon Council granted planning permission for enhanced plans, and in January 2018 the Mayor of London approved the scheme. In May 2018 John Lewis and Waitrose were secured as key anchor tenants, with an 'earliest' target opening date of 2023. More recently (November 2019), the Croydon Partnership (Westfield/Hammerson) and Croydon Council met to discuss the redevelopment of the town centre, with a focus on a revised scheme to ensure "the development meets the rapidly changing needs of consumers, retailers and the overall town centre".

4.17 The revised proposals include a higher proportion of mixed-use including high-quality offices and co-working spaces, a hotel and homes alongside a scaled-down retail offer. The statement published by the Croydon Partnership states that "considerations also include fewer parking spaces, the possibility of retaining and reusing some key buildings and more open space, which aligns closely with the council's and the partnership's sustainability agendas. While the revised scheme is worked up in more detail, the partnership will continue to invest to improve the town centre and encourage new trade". The implementation and opening of the scheme is unknown at this early stage.

4.18 In **Guildford**, PRUPIM – now rebranded as M&G Real Estate – have revisited the retail-led redevelopment aspirations for the North Street site. In a statement released in January 2019, the Council Leader noted that the Council and its partner M&G Real Estate are now proposing a mainly residential development in response to the challenging retail climate. The retail need figure of 41,000 sq m incorporated into the draft Local Plan was now deemed out of date and inconsistent with the national economy and town centre trends. Plans are yet to move forwards and timescales are unknown.

4.19 In **Kingston**, planning permission (Ref: 15/13063) was granted for the redevelopment of the Eden Walk Shopping Centre in December 2016. The scheme will comprise c.18,000 sq m of A1-A5 retail and leisure space, a boutique cinema, new dining terrace and cafes – including a 'Sky' restaurant – and 385 apartments. We understand that preliminary piling works commenced during the summer (2019) indicating the commencement and implementation of the permitted scheme. This will strengthen and consolidate the town centre offer in Kingston and might create a greater level of competition for Epsom Town Centre. The exact mix and composition remains unknown, and might – given retailer trends – move to a greater level of food/drink/leisure, for example.

4.20 In **Sutton**, the gas holder site planning permission has since been implemented (Ref: B2013/68306) at the far north of the high street. The scheme comprised 177 residential flats, nine town houses, a 12,221 sq m gross foodstore – now occupied by Sainsbury's – a district heating centre and public realm improvements, including a new public square. The foodstore is open for trading and ground floor units on High Street are occupied by Cosa, EasyCoffee, Thegymgroup.com, Magnet Kitchens, Project Design and Poundstretcher.

4.21 In January 2017, Sutton Council commenced the implementation of improvements to Market Place Sutton, delivered through £500,000 of central government funding to assist in improvements to the northern end of the pedestrianised High Street. Key projects have included improving shop fronts and upper facades as 'blocks' rather than individual units, tidying up and investing in the public realm and a programme of events. In June 2016, Sutton Council published the Town Centre Masterplan, with a focus on three key development opportunity sites including new development and improvements to street activity at the St Nicholas Shopping Centre, redevelopment of the Civic Centre for a mix-use scheme including new spaces for arts, culture and entertainment, and redevelopment of Sutton Train Station to include employment space.

4.22 Further projects identified in the Sutton Masterplan include the creation of a new South London destination with culture, leisure and restaurant activity, with the area to the south of St Nicholas becoming a focus for independent restaurants, outdoor arts and festivals. They plan to create an enhanced residential neighbourhood at the north of the town centre, and to transform the gyratory into an urban boulevard lined with high quality buildings, street front activity and town centre living.

Summary

- Kingston and Sutton continue to draw greater levels of comparison goods trade from the Zone 1-12 Survey Area when compared to Epsom Town Centre, reflecting their scale and higher order shopping roles. The evidence demonstrates, however, that Epsom is the only town centre that has grown its market share (within Zone 1-12) over the last 11 years at the expense of all other shopping destinations. Epsom has consolidated its position and clawed back lost trade – a

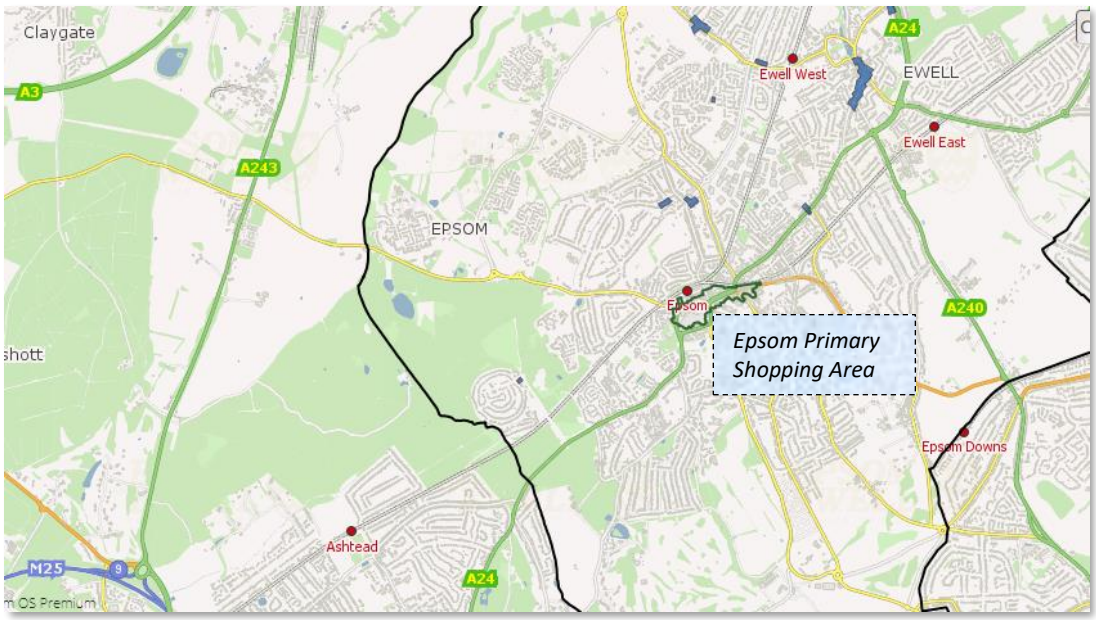
particularly strong performance and vitality indicator. This achievement has taken place within a difficult economy, when many towns are struggling to retain previous levels of vitality and viability.

- Moving forwards, Kingston, Croydon, Guildford and Sutton all had major retail/town centre expansion plans. In light of economic circumstances and the declining health of the retail sector in recent years, Croydon and Guildford have halted schemes for review with an emphasis on residential led schemes and a substantial scaling back of retail. Kingston continue to move forwards with the redevelopment of the Eden Shopping Centre, although the final mix of Use Class A is unknown but likely to reflect a scaled-down A1 floorspace element. Sutton have identified town centre development sites, but none are likely to incorporate a substantial level of floorspace.
- There is a clear opportunity for Epsom to retain – if not improve – market share still further over the next 5-10 years through a continued pro-active strategy of investment, partnership working and a robust policy framework. This is discussed further in the final section of this report.

5. Epsom Town Centre

5.1 The composition and health of Epsom Town Centre was previously analysed in the 2009 Retail Study and 2015 Retail Study Update. This Study (2020) provides an up-to-date analysis of the health of Epsom Town Centre, drawing on desk-based research, detailed on-site surveys, and data obtained from the Council. The outputs provide an opportunity to understand how Epsom has changed in respect of the key vitality and viability indicators over the last 10/15 years, and how the centre is currently performing.

Epsom Town Centre Primary Shopping Area and Context Plan [Proposals Map Extract]



Previous Evidence Base

2009 Retail Study

5.2 In 2009, Epsom was identified to be a healthy town centre performing adequately in a number of key areas. Across the town centre, representation from comparison goods retailers and leisure and service businesses was strong; it had improved its position in the national retailer demand rankings, Prime Zone A rents had remained unchanged, retail yields had improved and vacancy rates were low.

5.3 The Study did identify areas for improvement and consolidation over the LDF period, preventing the centre from slipping into a lower order 'clone' town. Epsom had, for example, fallen in the Javelin (leading consultants in data intelligence and sector analysis) rankings of town centres reflecting the failure to improve the range and mix of higher order retailing; the proportion of convenience goods floorspace was below the national average; there were a number of heavily trafficked road junctions and barriers to pedestrian movement; usage of the Town Centre in the evenings was low; and the Town Centre faced strong competition from out-of-centre floorspace, notably the Sainsbury's at Kiln Lane.

5.4 The retail offer at that time comprised a high number of mid-range multiple retailers, but the representation from higher quality multiples and niche/specialist and independent retailers was weak and showed no signs of improvement. In 2009, this was concluded to be partly a consequence of the recession and partly the characteristics of constrained retail floorspace within shop units. High Street eastern end had recently lost two key anchors, Woolworths and Boots; albeit Boots did remain in the town centre, relocating to the Ashley Shopping Centre.

5.5 The 2009 report concluded that the greatest threat to Epsom wasn't necessarily the larger centres, which will inevitably continue to trade at a higher level, but rather the decline of its own retail offer and

the proliferation of fast food take-aways and charity shops, for example. The report recommended that overcoming traffic congestion and encouraging ease of pedestrian movement throughout the town centre should form a crucial element of the forthcoming Area Action Plan (Plan E).

2015 Retail Study Update

5.6 The 2015 Retail Study reported that the implementation of Plan E (2011) was already having a positive outcome. Epsom was continuing to perform well, with a falling vacancy rate, a strong proportion of multiple comparison retailers, evidence of business investment/refurbishment, and a large number of new, good quality businesses, all contributing to a wider town centre mix. The restriction of A5 take-away businesses across primary and secondary shopping frontages had shown signs of success, and the Council had secured substantial funding for highway and public realm improvements.

5.7 The Council's firm policy stance on town centre consolidation and the restriction of out-of-centre development had enabled a positive focus on encouraging town centre enhancement, retailer representation and footfall. The fall in the number of convenience goods operators was – at that time – of concern, particularly as the number of such businesses was already below the national average. It was recommended that this be monitored, and existing businesses protected.

5.8 In terms of specific operators, it was noted in 2015 that The Albion, Marquis of Granby, Slug & Lettuce, Clintons Cards and Kingfish Fish & Chips had all undergone major refurbishment, and Skyrah Beauty Salon on Upper High Street had moved in to a new, larger unit. The HMV unit had been re-occupied by Sports Direct, and 'Hotter Shoes' had moved into the vacant Ann Summers unit. Between the 2009 Retail Study and the 2015 update, a substantial number of new operators had moved into the centre, including:

- Cabello (A3)
- Guitar Guitar
- Stormfront (Apple/Computers)
- Bills Restaurant (A3)
- Hotter Shoes
- Pandora Jewellers
- Sports Direct
- Metro Bank
- Jones Bootmakers
- Pure Gym
- Costa Coffee, Ashley Centre
- Costa Coffee, Odeon
- Costa Coffee, Epsom Station
- Muffin Break (A3)
- La Piccola (A3)
- Roosters Piri Piri
- Mountain Warehouse
- Nandos
- Smiggle Stationery
- Black Burgers

5.9 The mix of new operators listed above represented strong, good quality businesses. 'Guitar Guitar' is the largest guitar shop in the UK, and is a flagship store anchoring the far eastern end of 'High Street East', providing a good retail 'link' with Upper High Street. Cabello and Bills introduced a family friendly eating experience, offering breakfast, brunch, lunch, afternoon tea and dinner, and both were successful in meeting a gap in this type of higher end/quality A3 use. Bills is a key footfall driver to the west of the town centre on South Street, and Cabello is a good anchor at the eastern end.

5.10 The introduction to the Town Centre of a strong selection of good quality operators between 2009 (the previous Household Telephone Survey) and 2019 (the most recent Household Telephone Survey) assists in explaining the reason Epsom Town Centre has improved its performance in respect of market share retention – as identified in Section 4 of this report. Floorspace performance is discussed further in Section 8.

5.11 The Town Centre had retained House of Fraser, M&S, Next, Monsoon, New Look, The Body Shop, TK Maxx, Wilkinsons, WH Smiths, Fat Face, Boots the Chemist, Evans/Dorothy Perkins, Clarks Shoes, Superdrug, and H Samuel as key anchor tenants and footfall drivers. In terms of foodstores, Waitrose and M&S Food were still represented in the Ashley Centre, Co-op had two stores on Upper High Street and Waterloo Road, and Tesco Express had recently been introduced as part of the Epsom Station redevelopment.

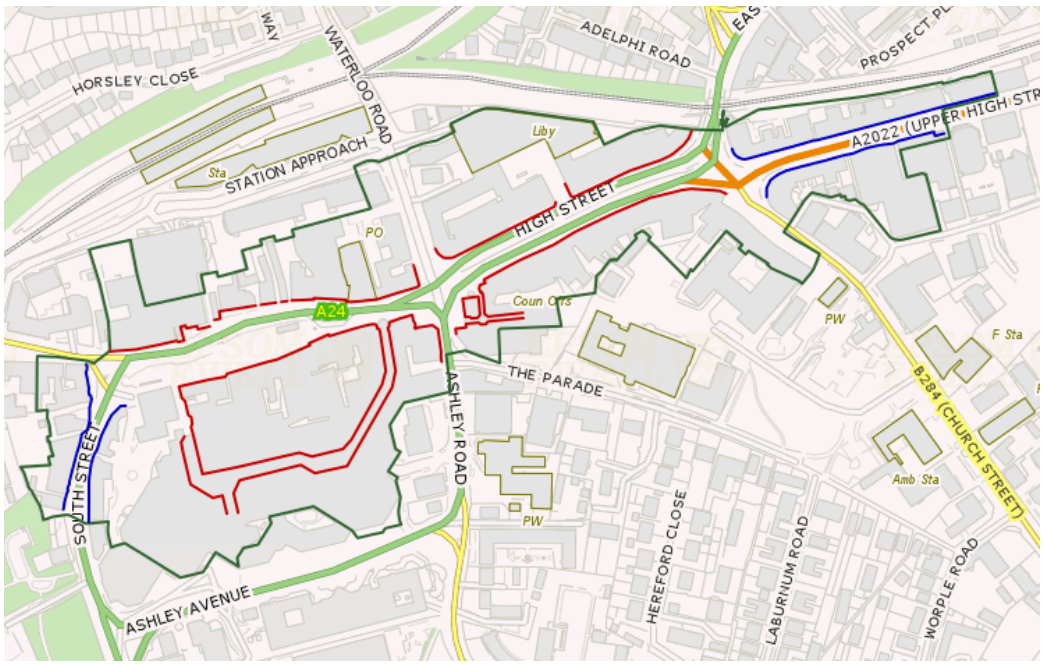
5.12 Moving forwards, the report recommended that the Council continue to focus on prioritising pedestrian circulation and frontage integration, particularly on High Street Eastern End. Case study concepts presented were highlighted as exemplars with recommendations to implement alongside frontage improvements in order to substantially benefit the retail environment on High Street Eastern End. These 'grassroot' improvements were highlighted as key to enhancing the retail offer at a future date.

5.13 The development sites within the Primary Shopping Area which remained available and suitable for redevelopment at that time included Site 4: Upper High Street – East End Site, Site 6: TK Maxx Urban Block, and Site 7: Woolworths/QS Clothing.

Diversity of Uses

5.14 The health check and audit of Epsom Town Centre (2020) has been undertaken within the Primary Shopping Area boundary as illustrated by the green line on the proposals map extract below. The Primary Shopping Frontage is illustrated using a red line, and the Secondary Shopping Frontage is identified with a blue line. Section 9 of this report concludes whether these allocations remain appropriate in the context of the evidence, analysis and subsequent findings.

Epsom Town Centre Primary Shopping Area [Proposals Map Extract]



Note: Primary Shopping Frontage: Red line / Secondary Shopping Frontage: Blue line

5.15 Based on the latest survey undertaken by Experian Goad (November 2018), Epsom Town Centre currently comprises 664,900 sq m gross of retail and service floorspace across occupied and vacant units. Tables 5.1 and 5.2 below set out the diversity of retail and service units in Epsom town centre compared to the national average in respect of town centre composition.

Table 5.1: Epsom Town Centre Composition of Uses (Units)

	No. of units	% of Total	UK Average (%)	Variance
Convenience	21	7.1	9.2	-2.1
Comparison	85	28.8	29.6	-0.8
Leisure Service	68	23.1	24.4	-1.3
Retail Service	49	16.6	15.0	1.6
Financial & Business Service	39	13.2	9.9	3.3
Vacant	33	11.2	11.7	-0.5
Total	295	100	100	-

Table 5.2: Epsom Town Centre Composition of Uses (Floorspace sq m gross)

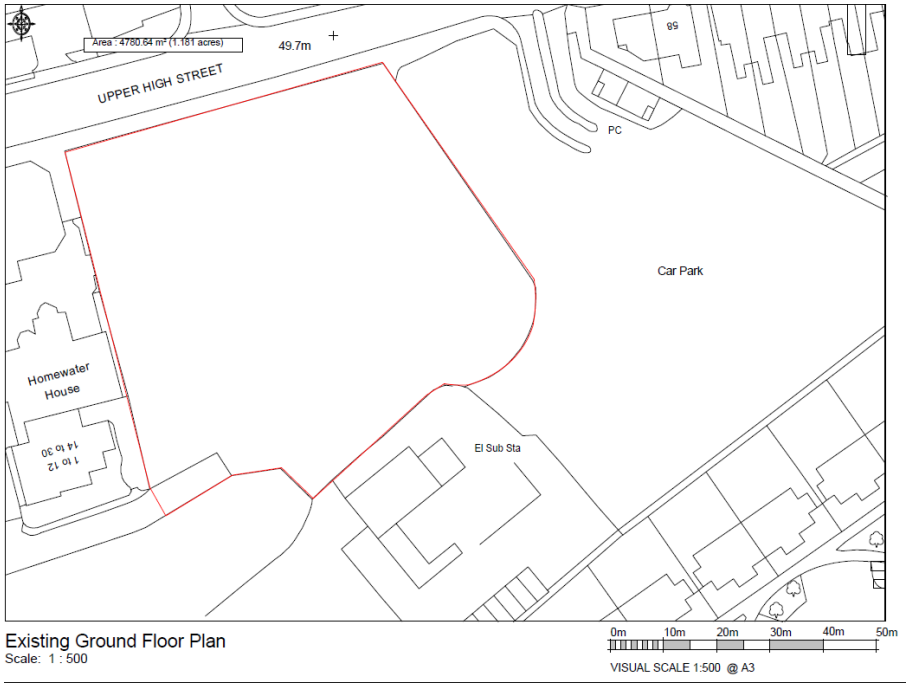
	Floorspace	% of Total	UK Average (%)	Variance
Convenience	55,500	8.4	15.4	-7.0
Comparison	281,000	42.3	33.8	8.5
Leisure Service	158,300	23.8	25.5	-1.7
Retail Service	45,800	6.9	7.0	-0.1
Financial and Business Service	61,600	9.3	7.4	1.9
Vacant	62,700	9.4	10.3	-0.9
Total	664,900	100	100	-

5.16 ***'Convenience Goods'*** provision in Epsom Town Centre is marginally below the UK national average, accounting for 7.1% of total units (compared with the national average of 9.2%) and 8.4% of total floorspace (compared with the national average of 15.4%). Main foodstore representation in the Town Centre remains largely unchanged from previous evidence base studies with M&S and Waitrose both represented in the Ashley Shopping Centre, two Co-op stores on Upper High Street and Station Approach, and a Tesco Express store within Epsom Station.

5.17 Remaining convenience stores are occupied by a mix of businesses including the good quality 'Ben's Butchery' on Upper High Street, Greggs Bakers on the main High Street, Gillespie's bakery on West Street, a number of vape/tobacconist stores, confectionary stores (Hotel Chocolat and Hatty's Sweet Shop), and four health food shops distributed across the town centre.

5.18 On 6th March 2018 Epsom and Ewell Borough Council granted planning permission (Ref: 17/00001/FUL) for a new Lidl foodstore on part of the Plan E Depot Road/Upper High Street development site (see site location plan below). The permitted scheme, which is just outside the Primary Shopping Area, comprises a mixed-use development including a full-sized Lidl foodstore (1,427 sq m net) and 30 residential apartments. The scheme, fronting Upper High Street, has not yet commenced and the vacant site remains boarded-up.

Depot Road/Upper High Street Site Location Plan Ref: 17/00001/FUL



Note: Mixed use residential and Lidl foodstore development

5.19 The ***'Comparison Goods'*** (non-food) offer is marginally below the UK national average in terms of number of units; 28.8% compared to 29.6%. The proportion of floorspace allocated to comparison goods is, however, substantially above the UK national average; 42.3% compared 33.8%, suggesting comparison goods operators are occupying larger than average unit sizes.

5.20 The Experian Goad Category Report (2018) provides a finer grained break down of the sub-categories of comparison goods which highlights the above average number of booksellers, carpets and flooring, general clothing, cycles and accessories, department and variety stores (Robert Dyas/Wilko/M&S/House of Fraser), toys and games, musical instruments and greeting cards. It is evident, however, that Epsom has a below average provision of ladies and menswear and accessories and footwear.

5.21 The level of change and introduction of new retail operators to Epsom Town Centre has slowed since the period between 2009 and 2015 (as listed above), but aside from Hotter Shoes and Mountain Warehouse all new operators identified during that period remain open and trading. The key retailer to open in the last 4/5 years is Waterstones book shop on High Street, a newly branded high-quality retailer with substantial footfall benefits for this part of the High Street close to Fat Face. Popular brands Kiko cosmetics and Trespass outdoor clothing have also recently opened in the Ashley shopping centre.

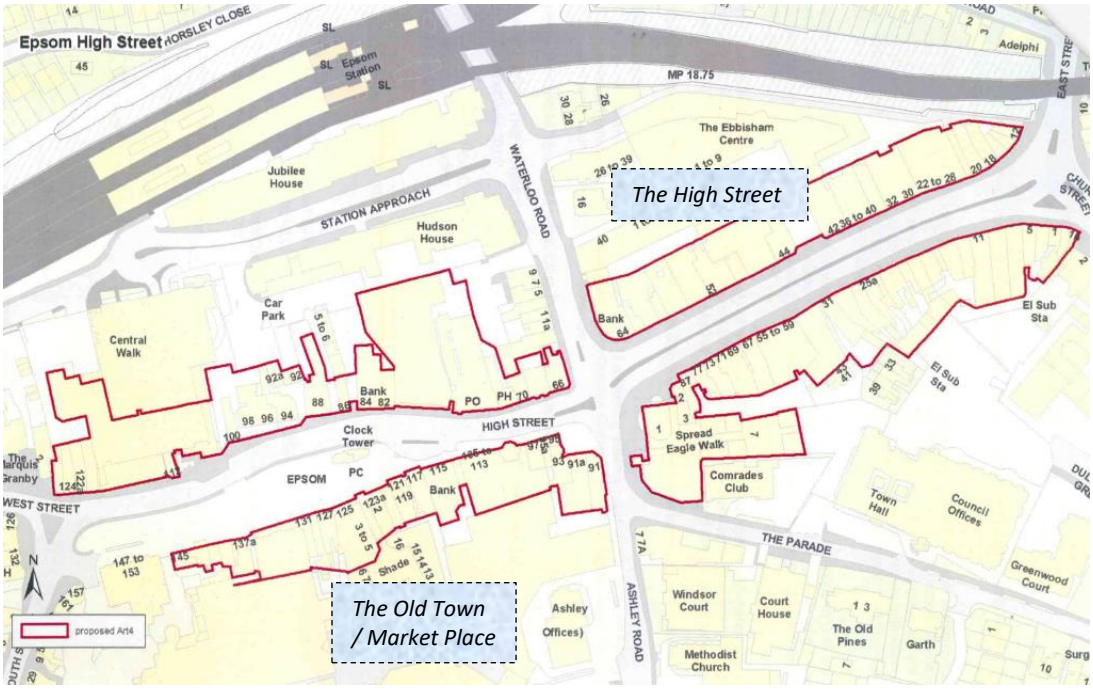
5.22 Epsom has retained key anchor multiple retailers including M&S, TK Maxx, H&M, Next, Monsoon/Accessories, New Look, House of Fraser, White Stuff, Fat Face, Wilko's, Clarks, Boots, Superdrug, Lakeland and Jones the Bootmakers. Whilst this is a strong grouping of operators, the figures suggest representation is below the national average in the clothing categories, identifying a potential opportunity for Epsom to accommodate more of this type of retailer.

5.23 Comparison goods retail composition in Epsom Town Centre is mid-range and falls short of a more extensive range of higher end operators of the type found in Reigate and Kingston. These include, for example, White Company, Cath Kidston, East, Jigsaw, Hobbs, Space NK, Warehouse, Mint Velvet and French Connection. A town centre strategy should continue to seek representation from such operators,

but proximity to towns already represented and size of town might affect business decisions in respect of target locations. Town centre partners should target conversations with these operators to understand their requirements.

5.24 ***'Financial and Business Services'*** has the least number of units in the town centre (39), but is above the national average, 13.2% compared to 9.9%. This category comprises banks, building societies, estate agents, financial and legal services and employment and career centres, all of which fall within the Use Class A2 category. An Article 4 Direction introduced in October 2015 removed permitted development rights from Use Class A1 to Use Class A2 across much of the town centre (see plan below). The evidence suggests that, whilst Use Class A2 adds to the diversity of a town centre, the Article 4 Direction is needed to prevent any further introduction of such uses across Epsom town centre, particularly in key High Street areas.

Epsom Town Centre Article 4 Direction Boundary (Defined October 2015)



5.25 The second largest retail category – after comparison goods – is ***'Leisure Services'*** occupying 68 retail units across Epsom town centre. This is equivalent to 23.1% of total units in the town centre, almost in-line with the UK national average (24.4%). A finer-grained analysis suggests a positive and healthy mix with an above average proportion of cafés, cinemas and theatres, nightclubs, and restaurants, and a below average proportion of betting offices, fast food outlets, public houses and sport/leisure facilities.

5.26 Development management policies appear to have been successful in preventing the proliferation of fast food outlets and betting offices. Recent good quality additions to the town centre café/restaurant offer include 'Creams' on High Street, Prezzo on High Street, Pret a Manger at the Spread Eagle junction, Yo Sarnie Upper High Street, and Il Grande Epsom Square. Mainstream restaurant operators present in 2015 and which continue to trade include Ask, Café Rouge, Bill's, Pizza Express, Nando's, and Blacks Burgers. The fast food chain, KFC, achieved planning permission at appeal (Ref: APP/P3610/W/18/3205266) and is now located at 17 High Street. We discuss this appeal decision in more detail later in this section.

5.27 Epsom Town Centre benefits from offering strong leisure visitor attractions including Pure Gym, Epsom Playhouse Theatre and the Odeon Cinema. Planning permission (Ref: 18/01556/FUL) has recently been granted for a new six screen Picture House cinema in Epsom Square, offering bar, restaurant and kiosk

area and party room; whilst the existing Odeon on Upper High Street has recently undergone substantial investment to convert to an Odeon Luxe branded cinema with cushioned reclining seats, tables, bar and additional leg-room.

5.28 ***Retail services*** occupy 49 units in Epsom Town Centre, 23.1% of the total compared to the UK national average of 24.4%. The figures suggest there is not an over dominance of this goods category, but that the category itself is dominated by health and beauty salons (34 units / 70% of retail service units). Hair and beauty salons fall within Use Class A1 and are, as a consequence, difficult to restrict through development plan policies. Alternative businesses include a small selection of dry cleaners, opticians and the Post Office on High Street.

Diversity of Uses: Town Centre Change 2009-2020

5.29 Table 5.3 below, compares the town centre composition by number of units since 2009. It is evident that over this period, the proportion of convenience goods and service operators has remained relatively stable across the Town Centre. The analysis of trends does, however, highlight the significant fall in the number and proportion of comparison goods operators over the last 11 years (from 114 to 85) with the most significant fall in the last 5 years. There has also been an increase in vacant units from 22 to 33 over the same 11-year period.

Table 5.3: Epsom Town Centre Diversity of Uses by Number of Units 2009-2020

	No.of Units 2009	% of Total 2009	No.of Units 2015	% of Total 2015	No.of Units 2020	% of Total 2020
Convenience	22	7.2	18	6.1	21	7.1
Comparison	114	37.3	104	35.1	85	28.8
Service	147	48.1	156	52.7	156	52.9
Vacant	22	7.1	18	6.1	33	11.2
Total	**306**	**100**	**296**	**100**	**295**	**100**

5.30 The 2015 Retail Study update noted that the fall in comparison retailers was not necessarily a growing weakness in the centre, as representation continued to be above the national average. It was suggested that the figures perhaps reflected the need for town centres to evolve within the current market context; to comprise a mix of food, non-food and eating/drinking destinations to enhance dwell time and the ability of Epsom to remain and grow as a destination of choice.

5.31 The qualitative overview has highlighted that whilst the number of comparison goods units has fallen, the amount of comparison goods floorspace remains substantially above the national average. The qualitative overview has also highlighted the ability of Epsom to retain the strong mix of national multiple comparison goods operators over a mid to long term timeframe.

5.32 This key finding is supported by evidence presented in the 2015 Retail Study update. The 2015 update highlighted that the representation of national multiple comparison goods retailers has remained strong. It was recorded that in the previous study (2009), multiple retailers in Epsom made up 70% of the comparison shopping offer, and in 2013 this figure was 65% - a small drop. Experian Goad recorded this figure to have increased to 67% by November 2018 (See Table 5.4 below). This is a particularly positive vitality and viability indicator in today's national market context.

5.33 Experian Goad define a multiple outlet/major retailer as follows:

> *"A multiple retailer is defined as being part of a network of nine or more outlets. The presence of multiple outlets can greatly enhance the appeal of a centre to local consumers. The strong branding and comprehensive product mix of retailers are often sufficient in itself to attract consumers to a centre."*

Table 5.4: Epsom Town Centre % of Comparison Goods Operators within 'National Multiple' Category

2009	2013	2018
70%	65%	67%

5.34 This analysis suggests that whilst Epsom has experienced a substantial fall in comparison goods operators over the last 11 years, it has succeeded in retaining the major key attractors so crucial in underpinning Epsom as a town centre of choice for the local catchment area.

5.35 Nevertheless, the trend has been one of decline, and the proportion of comparison goods operators has now fallen marginally below the UK national average. A continued trend and a similar fall in the number of comparison goods retailers over the next five years could have serious consequences for the overall performance of the town centre in the future. Policy intervention is key to ensuring the protection of Use Class A1 comparison goods operators over the forthcoming Local Plan period.

Use Class Composition

5.36 The Council's adopted development plan (discussed in Section 2) confirms that the overall percentage of Use Class A1 within the Primary Shopping Frontage should not fall below 66%. During 2018, the Council prepared an analysis of Use Class within the Primary Shopping Frontage, the outputs of which are set out in Table 5.5 below. The analysis segmented different parts of the frontage for the purposes of comparison and also concluded the total figures across the full frontage.

Table 5.5: Epsom Town Centre, Use Class A1 Analysis within Primary Shopping Frontage

Primary Shopping Frontage	Number of Units	Number of Units in Use Class A1	% of Units in Use Class A1
High Street East (Northern Side)	25	17	68.0
High Street East (Southern Side)	29	18	62.0
High Street West (Northern Side)	22	11	50.0
High Street West (Southern Side and Market Place)	19	9	47.0
Ashley Shopping Centre	46	41	89.0
Spread Eagle Walk	3	1	33.0
TOTAL	**144**	**97**	**67.0**

5.37 The analysis demonstrates that only two areas of the Primary Shopping Frontage currently fall above the percentage threshold of 66%; including High Street East (northern side) and the Ashley Shopping Centre. All four remaining parts of the frontage fall considerably below this threshold, but the high percentage in the Ashley Shopping Centre pushes the total marginally above the Development Plan policy threshold.

5.38 The robustness and flexibility of the development plan frontage policies have recently been tested at appeal. In 2018, KFC applied for planning permission for the change of use of ground floor and first floor from retail (Use Class A1) use to a mixed restaurant and hot food take-away use (mixed A3/A5 use). The Council refused the application on the following grounds:

5.39 The proposed change of use of from A1 (Retail) to a mixed A3/A5 use, would be an inappropriate use in the Primary Retail Frontage, resulting in a proliferation of nonA1 uses in an important frontage in the Primary Retail Area, contrary to Policy E4 of Plan E (Epsom Town Centre Area Action Plan 2011) and Policy CS14 of the Core Strategy 2007.

5.40 KFC appealed the decision (Ref: APP/P3610/W/18/3205266) and received planning permission in March 2019. The Inspector noted that Policy E4 of the Local Plan (LP) states that within Primary Shopping Frontages, the percentage of use Class A1 units shall not fall below 66%, and that the Council will actively encourage a higher proportion than 66%. The Inspector added that Policy E4 also states that uses other than A1, A2 and A3 will not be permitted.

5.41 In drawing her conclusions, the Inspector recognised that the percentage of A1 uses across the entire Primary Shopping Frontage is around the policy threshold of 66%, and whilst some stretches had a significantly lower level (than 66%), the appeal site is located in a stretch which is just over the policy threshold of 66%; and is in close proximity to the Secondary Shopping Frontage. The Inspector concluded that 'allowing the appeal would marginally decrease the percentage of A1 units along this stretch and in the town centre as a whole, [she] was not satisfied that the resultant level of A1 units would fall below the policy threshold'.

5.42 Overall, the Inspector drew conclusions against policy wording, but did make additional observations. She noted that if the size and width of Use Class A1 frontages were factored into the calculation, Use Class A1 would substantially exceed the 66% threshold. The Inspector also noted the difficulties of marketing/letting the unit; the range of cafes and hot food take-aways in close proximity – which were doing a 'brisk' trade; and the individual character of this stretch of the frontage.

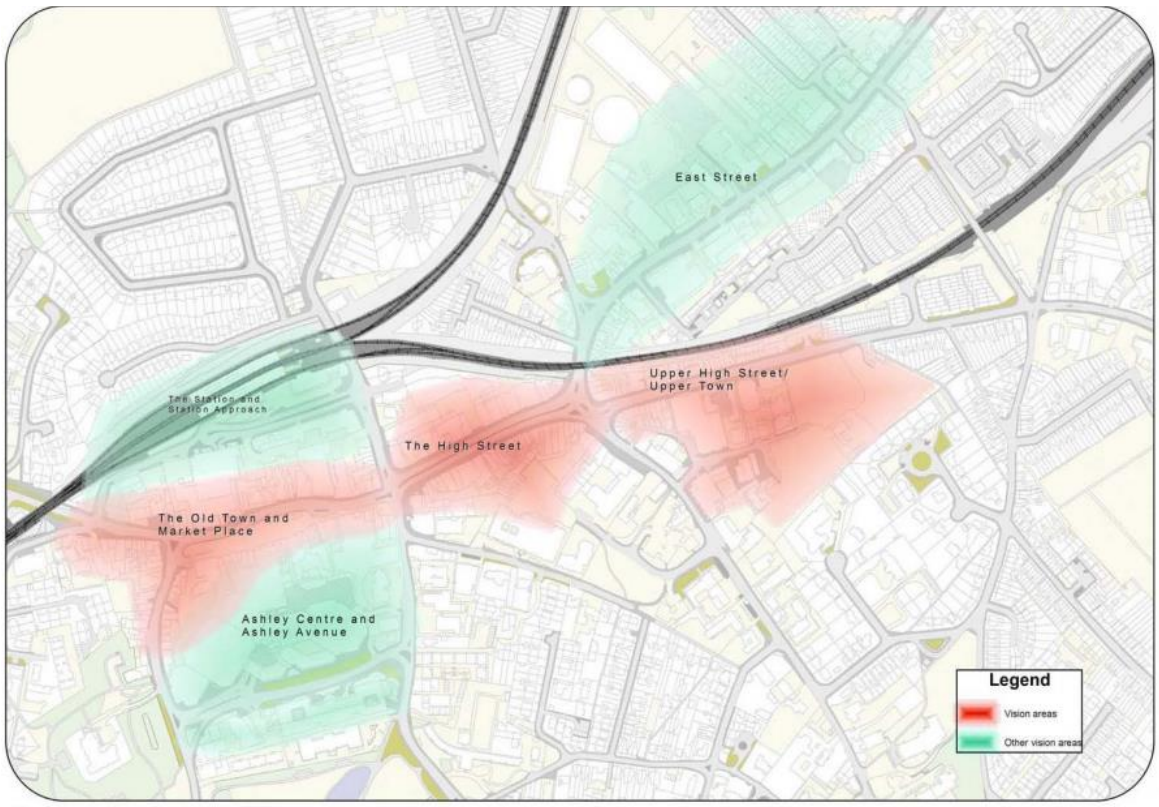
Character Areas

5.43 Retail character areas have been defined in previous evidence base studies and were incorporated into the town centre Area Action Plan, Plan E (2011). An analysis of each separate character area is a useful tool in understanding the vitality and viability of different parts of the town centre in order to form recommendations at a later date. Four retail character areas have been identified within the Primary Shopping Area as illustrated on the Plan E extract below:

- Ashley Centre and Ashley Avenue;
- The Old Town and Market Place;
- The High Street;
- Upper High Street/Upper Town.

5.44 We provide a detailed description of each below.

Epsom Town Centre Vision Areas [Plan E 2011 Extract]



The Ashley Shopping Centre

5.45 The Ashley Centre is a covered shopping mall located within the defined primary shopping area. It was built in the early 1980s, when parts of High Street were also pedestrianised during the construction of the one-way system. The centre is anchored by House of Fraser, Waitrose and Marks & Spencer, and offers the largest concentration of fashion and comparison high street retailing in the town centre. Other retailers include Monsoon/Accessorize, H&M children, H&M ladieswear, Next, Stormfront Apple, Ernest Jones, Boots the Chemist, WH Smith, Trespass outdoor, Smiggle, Claires Accessories, Sports Direct, Kiko cosmetics, Clarks shoes, Toy Barnhaus, Jones Bootmakers, Hotel Chocolat, and Clinton Cards, and a number of units have two floors, aside from House of Fraser which has three.

5.46 There are a number of A3 eating/drinking operators, including Starbucks, Costa Coffee, Bamboo Basket, Muffin Break, and Café La Moka. There is a central coffee shop in the central area. The centre has two entrances onto High Street, effectively creating a retail circuit, with M&S and Boots having double frontages with access to the Market Place.

5.47 The shopping centre is clean and well maintained and provides a popular shopping destination with a central atrium and café area. Pedestrian activity in the centre is strong with the highest footfall counts in the Town Centre, and the units offer reasonable space for the mid-range high street retailers. The shopping centre is within close proximity to the train station and benefits from its own car park with c.800 spaces which also performs the role of a wider town centre car park. The previously vacant Thomas Cook unit has now been occupied by a new travel agency and there are currently no vacant units in the shopping centre.

The Old Town and Market Place

5.48 The High Street (Western End) is located between the Spread Eagle junction and the junction of West Street/South Street. It comprises a one-way traffic route and wider pedestrianised area on the south

side which is occupied by market traders six days a week. This stretch of the High Street has some of the highest pedestrian footfall levels in the Town Centre largely concentrated around the eastern shopping centre entrance/Spread Eagle junction. Double fronted retailers including Marks & Spencer and Boots have entrances inside the Ashley Centre and on High Street which maintains footfall in this general location.

5.49 Retail units on the south side of High Street are generally small and occupied by a range of retail and service businesses including Lakeland, Natwest bank, Nationwide building society, Moss Bros, Café Nero, and Lloyds pharmacy. A number of unit formats on this stretch are smaller in scale, reflecting unit requirements of those comparison goods higher end clothing operators identified earlier in this section. This could be an appropriate frontage with which aspire to attract representation from a small selection, albeit the frontage is currently fully occupied with good quality businesses. A number of buildings are attractive with local and historic interest which maintains the overall environment to a reasonably high quality.

5.50 The north side of High Street is largely dominated by TK Maxx, Carpetright, Barclays Bank, Wilkos, health and beauty and Pure gym. There is a more diverse selection of eating and drinking establishments, with The Marquis of Granby public house, Café Rouge, The Plaice to Eat fish & chips, and Café 1 all dispersed throughout the retail units. Retail units on the north side are generally ad hoc in terms of layout, positioning and format; they are more modern with less character and there might be longer term opportunities for land assembly and redevelopment, i.e. the group of units including TK Maxx westwards through to, but excluding, the Marquis of Granby public house.

5.51 A small selection of multiple retailers maintain footfall in this area of the Town Centre, including TK Maxx and Wilkos, but the large number of units do not act as major attractors for shoppers on their own. The stretch is therefore perhaps vulnerable if one or two major multiples moved or closed down, and there appears little opportunity to attract a greater number of new high street fashion multiple retailers given the size and format of retail units which are likely to be too large for modern requirements. TK Maxx and Wilkos are, nationally, performing well and their departure is unlikely; their retention as operators should be encouraged. Nevertheless, given their scale the Council should begin to consider the long-term role and future of these large sites/units so as to ensure a swift response to changes in the retail market and potential departure of key attractors. Development sites are discussed further in Section 9.

South Street

5.52 South Street forms part of the Old Town character area and is located to the far western end of the town centre. It performs the role of a secondary retail frontage with some of the lowest footfall counts in the town centre, along with Upper High Street, discussed below. This part of the town centre offers a selection of eating and drinking destinations in the form of restaurants and public houses rather than fast food take-aways. These include McCafferty's Bar, Bills, Pizza Express, Epsom Thai, Makiyaki, Indian Flame and Café Viriato.

5.53 The street also offers a small range of specialist retailers including Purrfect Pets, Sam Ross Hair, Sew n Sew repairs and alterations, doors and windows, and male grooming and hair boutiques. South Street performs a niche retail and service role in the town centre offering good quality eating and drinking destinations and some specialist shops. This should be protected over the forthcoming Local Plan period from the potential infiltration of Use Class A2, Office B1 and fast food take-aways (Use Class A5) and the promotion of A3 and A4 uses, and specialist A1 independent retailers/high quality multiple retailers that add interest to the town centre retail mix.

The High Street (Eastern End)

High Street

5.54 The eastern end of High Street is located between Spread Eagle junction and East Street/Church Street junction. This stretch also has some of the highest footfall levels in the town centre alongside High

Street: Western End, albeit marginally lower than the Ashley Centre. As noted earlier, this stretch has a strong proportion of Use Class A1 operators. The retail units offer a format more conducive to mainstream high street retailers than those found in the western end discussed above. They are of a reasonable scale with a consistent frontage and stretch of three storey historic buildings. The shop fascia's are, however, more modern and 'clone' detracting from the quality of the buildings at the higher levels, whilst investment and repair would benefit the upper floors externally.

5.55 Units are occupied by a range of comparison and service businesses although few from the clothing and footwear category which are found instead in the Ashley Shopping Centre. Fashion retailing includes JD Sports, Mountain Warehouse and Fat Face. Key attractors are, however, located along the full stretch of the High Street and include Waterstones, the Post Office, Pullingers Art Shop, Games Workshop, Poundland, Savers, Rymans, Robert Dyas, and Specsavers. Cafes/Restaurants include Ask, Prezzo, Cabello Lounge, Zig Zag, Creams; banks include HSBC, Santander and Leeds Building Society; and fast food outlets include McDonalds, Subway and KFC.

5.56 This central part of the town centre was once the key focus for retailing in Epsom Town Centre, but for some years now the shift of retail provision has focused more on the western end in and around the Ashley Shopping Centre. Previous evidence base studies concluded that this stretch was vulnerable to decline having been increasingly occupied by service businesses, charity shops, and discount / low end retailers. This followed the closure of Woolworths and Boots some years ago.

5.57 More recently, however, a number of key attractors which are popular locally have been introduced to this stretch of the High Street – alongside those operators that have already been represented for a number of years. At the far eastern end (furthest from the Ashley Centre) is Pullingers art shop, Zig Zag café, Savers, Robert Dyas, KFC, Specsavers, Game, Prezzo, Caballo Lounge and McDonalds. Toward the central and western end (closer to the Ashley Centre) is Waterstones bookshop, Fat Face, JD Sports, the Post Office, Creams, Ask, Poundland, Greggs, HSBC and Santander. A strong selection and range of operator underpinning footfall and the vitality and viability of this character area.

5.58 The physical environment is not conducive to pedestrian movement from one side to the other, largely constrained by heavy 4-lane traffic and a dominant central reservation barrier along the full length of High Street. There are three pedestrian crossing points on this stretch of the High Street, but the barriers to circulation are evident.

Spread Eagle Walk Shopping Precinct

5.59 Spread Eagle walk is located at the western end on the junction of High Street and Ashley Road. It is a small retail arcade which has experienced operator turnover in recent years. Argos has left and is now located within the out-of-centre Sainsbury's Kiln Lane; the Argos unit remains vacant and the children's shoe shop closed down following the owner's retirement. The Lester Bowden clothes shop is a prominent, well known ladies and gentleman's outfitter with historic links to Epsom Town Centre. The store has evolved and now stocks high quality brands including Joules, Tommy Hilfiger, Lacoste, Loake Shoemakers, Barbour, Superdry, and Polo Ralph Lauren. The store is also a prominent school uniform provider with links to over 500 schools across the UK.

Epsom Square

5.60 Originally built in the 1990s, the development was known as The Ebbisham Centre, Derby Square and Oaks Square. It opened in 2001 following joint collaboration between the County and Borough to bring a number of related facilities together and to re-energise part of Epsom town centre. The scheme, which followed a £16m investment, incorporates a library and learning centre, GP surgery, lifestyle health centre, centre café and performing arts studio and meeting facilities.

5.61 The site underwent a major re-branding and investment project in 2017 and is now known in entirety as 'Epsom Square'. The built environment was previously tired with evidence of graffiti and old paint work, but the 'overhaul' has addressed these issues. The recent investment into the public realm and

eating/drinking and pop up kiosks aimed to fully establish the square as an eating/drinking and café culture destination. Operators include Be at One, Blacks Burgers, Dia y Noche Lounge, El Patio, Esquires Coffee, Everest Spice, Il Grande, Jooby Thai street food, Nando's and Simply Greek.

5.62 The development can be accessed from High Street (eastern end) between Creams (crepes, waffles and ice-cream) and the vacant unit previously occupied by Maplin. There is also an entrance leading out to Epsom train station. Epsom Square provides a good variety of restaurants for visitors to Epsom Town Centre, and – if implemented – the recently permitted Picture House cinema will substantially add to the attraction of the area and wider town centre. When let, it would be beneficial for the wider area if the vacant unit on the entrance corner (previously Maplin) opened up frontages on front and side as far as is possible to encourage street level activity and footfall.

Upper High Street/Upper Town

5.63 Upper High Street runs from the junction of East Street/Church Street to the eastern edge of the Primary Shopping Area boundary. Buildings are smaller in scale although historic and interesting in character offering a largely consistent frontage, although shop fascias and building maintenance would benefit from investment. Upper High Street offers a strong mix of operator with anchor tenants including the Odeon Cinema (with Costa), Ben's Butchery and a busy Co-Op convenience stores. This stretch of the Primary Shopping Area also performs the role of a local shopping high street for nearby residents.

5.64 A number of specialist retailers are represented including Dreams Beds, Fudges Cycle Store, Kenneth Broome Photography, Jesters Party Shop, the Tatoo Studio, and the Quality Dry Cleaners. A specialist tutoring college, Kip McGrath, has opened up in one of the shop units, and Epsom Food Express is an international supermarket. Cafes/restaurants include Hunger Hatch, Yo Sarni, Miniature Bar & Grill and Khans Indian; fast food take-aways include Mei House Chinese, Maxi Express Chicken, Dominoes Pizza, Anatolia Kebabs and American Pizza House. A number of hair and beauty salons are represented including Stuart John, Tileys hair, Glamour Garage brows, Jade Nails and Skyrah Beauty. More recently, three fitness centres have opened in shop units – PT Depot, Evolve and Future Fitness.

5.65 We consider this stretch of the town centre offers a good mix of specialist retailers in a more secondary part of the shopping centre. The pedestrian barriers from the Church Street/East junction prevent visitors and shoppers continuing their journey along Upper High Street. Investment in the western part of the town centre – Market Place, South Street, Spread Eagle junction – has now taken place. The focus should not shift to the Church Street/East Street junction and High Street/Upper High Street to develop a better linked and integrated shopping area and much improved public realm and environment.

5.66 This area should be protected over the forthcoming Local Plan period from the potential infiltration of fast food take-aways (Use Class A5), B1 office uses, and A2 financial, business and property services, which would lead to certain decline in vitality and viability. Policy should restrict further A5 uses, and encourage a higher quality and mix of A3/A4 and specialist A1 independent retailers/high quality multiple retailers that add interest to the town centre retail mix.

Town Centre Investment/Change

5.67 Since the 2015 Retail Study Update, focused investment and a number of key changes in the town centre have taken place. With the receipt of funding from Surrey County Council and the Coast to Capital Local Enterprise Partnership – in addition to developer infrastructure contributions – major Plan E focused projects have taken place. This has included the conversion of South Street from a one-way to two-way road, aimed to reduce congestion in the town centre; the widening of pedestrian paving around Spread Eagle junction and improved/safer crossing points; and a major upgrade of Epsom Market Place.

5.68 Investment in Epsom Market Place has included full re-paving, new seating, wayfinding and tree planting, a new drinking fountain, relocation of the Evocation of Speed Statue, and a new location for the proposed Emily Davison statue.

5.69 The Epsom Business Improvement District (BID) was established in 2018 and covers the period 1st April 2018 to 31st March 2023, and is benefitting the town centre through additional revenue and town centre improvement projects. Run by local businesses for local businesses, the most popular ideas and priorities have been chosen through various surveys and meetings of those involved. Through a levy income of around £1.74m over 5 years, projects will relate to marketing and promotion, events, environmental improvements, business support, safer Epsom and parking and accessibility.

Perception of safety & occurrence of crime

5.70 Crime statistics published by Surrey Police provide a snapshot of crime levels in Epsom town centre over a three month period to July 2019. The data is summarised in Table 5.6 and identifies an average of 89 crimes a month in Epsom town centre. The most common types of crime reported were violence & sexual assault (70 reported crimes), theft (62 reported crimes), anti-social behaviour (50 reported crimes) and shoplifting (40 reported crimes).

5.71 It can be seen from Surrey Police's data that there are particular locations in the town centre where instances of crime appear higher; these include the vicinity of the railway station (where bicycle theft is the most common reported crime), as well as the area north of the High Street around Waterloo Road/Epsom Square. Shoplifting crimes were reported throughout the centre, but particularly in the Ashley Centre, where CCTV is superior and the value of goods higher.

Table 5.6: Reported Crime in Epsom town centre, May-July 2019

	May 2019 reported incidents	June 2019 reported incidents	July 2019 reported incidents
Anti-social behaviour	20	6	24
Public order	8	5	8
Theft	22	21	19
Violence & sexual assault	16	23	31
Shoplifting	12	10	18
Criminal damage & arson	1	3	3
Other crime	7	5	5
Total	**86**	**73**	**108**

Source: Surrey Police website, September 2019

Summary

- The evidence presented demonstrates good levels of vitality and viability across the Primary Shopping Area and highlights specific areas for policy intervention to ensure a continued sound performance moving forwards.
- The level of convenience goods provision has remained stable over the last 11 years, and is only marginally below the national average in terms of operator numbers. The range and choice for the local catchment will be enhanced if the permitted Lidl foodstore scheme is implemented just outside the Primary Shopping Area boundary on Upper High Street. The impact of this store on the town centre operators, and wider town centre performance, should be monitored once open and trading.
- Epsom has a strong mix of mid-range comparison goods retailers, albeit the number of operators in this category has substantially declined over the last 11 years. Despite this trend, Epsom has succeeded in retaining the major key attractors which are critical in underpinning Epsom as a town centre of choice; evidence highlights that the percentage of national multiples within this

category has actually increased by 2% in the last 5 years. Policy should aim to halt or reverse the decline of comparison goods operators. It is recommended that town centre partners should target conversations with higher end clothing operators in order to understand their locational requirements.

- The evidence demonstrates a good mix of shopping and leisure facilities, supporting and enhanced and multi-dimensional town centre. Cafes and restaurants are distributed throughout the town centre with improved facilities in Epsom Square, the Playhouse remains a key attractor, the Odeon has invested in a 'Luxe' upgrade, and Picture House has received planning permission for a new six screen cinema.
- Financial and business services is the category most in excess of the national average. Predominantly in Use Class A2 it is clear that the Article 4 Direction controlling these uses remains relevant and important in today's market. Audits of both Stoneleigh and Ewell – discussed in the following sections – have identified a growth in ground floor Use Class B1 across each town centre, and the Development Plan should be pro-active in preventing this trend from emerging within the Epsom town centre Primary Shopping Frontages.
- The Council have retained the overall Use Class A1 threshold of 66% within the Primary Shopping Frontage, and this policy was broadly supported and endorsed by the Secretary of State when tested at appeal in 2018.
- The analysis concludes that each 'vision/character area' remains vital and viable with distinct roles. Recent major investment has improved the cohesiveness and appearance of the western part of the town centre and also Epsom Square, with more projects planned by the BID team. A focus on safety and security will be important, responding to relatively high reported crime rates. The next phase of investment over the plan period should now focus on eastern part of the town centre including High Street (eastern end), the major Church Road junction and Upper High Street.

6. Stoneleigh Broadway

6.1 Stoneleigh is defined as a Secondary Town Centre in the adopted Development Plan. Lying in the far north of the Borough it is contiguous with Greater London and is located less than half a mile from the London Borough of Sutton administrative boundary and around 1.5 miles from the boundary with the London Borough of Kingston upon Thames. Building of the low-density housing stock commenced in the 1930's following the opening of the railway station, and today comprises predominantly semi-detached suburban houses.

6.2 The main shopping area is The Broadway, a purpose built linear high street built during the 1930's following the opening of Stoneleigh Railway Station [at the western end] in 1932. The railway line runs north/south, with the town centre falling in large part to the east. The town centre does not fall within a Conservation Area and there is just one Grade II listed building – The Station public house at the western end adjacent to the railway line/station. The up-to-date audit undertaken in September 2019 has identified 62 shop units.

Stoneleigh Boundary and Context Plan [Proposals Map Extract]



Diversity of Uses/Retailer Representation

6.3 Within the defined town centre boundary, there are 76 units recorded at ground floor level, although 14 of these are not identified by Experian Goad as a retail, service, financial/business or leisure use, instead being recorded as council and education services (D1/D2) and offices (B1). Table 6.1 below sets out the diversity of uses in Stoneleigh town centre compared to the national average in respect of town centre composition.

6.4 The proportion of ***comparison goods*** retailers in Stoneleigh Broadway is lower than the national average (-6%), which is perhaps consistent with its role as a secondary town centre in the borough. The mix of operator and number of useful 'everyday' businesses is limited, and includes two pharmacies, a pet supplies shop, florist, and an electrical goods store. Other operators include two charity shops, two-

bathroom showrooms/plumbing services, two window showrooms, a fabric shop, antiques shop, and one good quality ladieswear/accessories shop. The Epsom & Ewell District Scout Shop is also represented, offering a specialist product with only one outlet in the borough.

Table 6.1: Diversity of Uses in Stoneleigh District Centre, 2019

	Number of Units	% of Total	UK Average %	Different to UK Average %
Convenience Retail	8	13%	9%	+4%
Comparison Retail	15	24%	30%	-6%
Retail Services	16	26%	15%	+11%
Leisure Services	15	24%	24%	0%
Financial & Business Services	7	11%	10%	+1%
Vacant units	1	2%	12%	-10%
Sub-Total	**62**	**100%**	-	-
Other	14	-	-	-
Total units	**76**	-	-	-

Source: Urban Shape site visits, September 2019

6.5 There are eight ***convenience goods*** operators in the town centre (13% of total shops). A Sainsbury's Local store opens until 11pm every day, and offers a bakery and external cash machine; and a Co-op store on the opposite side of the road also offers a bakery and external cash machine, but opens until 10pm every day. The high street has two newsagents, and a good independent foodstore offer including a butcher and wine merchant, and chain bakery store 'Coughlan's'. Consistent with high street trends, Stoneleigh Broadway has one 'vape' shop. The mix and quality of convenience goods stores in Stoneleigh is strong, and likely to form a key overall attractor for the town centre.

6.6 The proportion of ***retail services*** is substantially above the national average (+11%), offering a good range and breadth of operator. These include a Post Office (selling cards, gifts and toys), three dry cleaners, a travel agent, four hairdressers, three beauty/tanning salons, shoe repair shop, carpet showroom, and car accessories. There is no optician on the high street, the closest being located in Ewell Village.

6.7 The proportion of ***leisure services*** (24%) matches the national average, providing 15 operators across the town centre. These comprise a bar, three cafes, The Station pub, three restaurants and six take-aways. There is also a specialist Art Club (Art-K) for children and adults providing a footfall driver for the high street and also a key attractor for those living further afield.

6.8 Seven ground floor units are occupied by ***financial and business services*** including three estate agents, three accountants and one financial planning service. This level of provision (11%) is broadly in line with the national average (10%), but – as is becoming commonplace on smaller higher streets – there are no banks or building societies represented. There is a range of 'other' non-retail businesses which help to generate footfall and linked trips across the town centre; these include a doctor's surgery, dentist, chiropractor, massage therapy, taxi office, dance academy/studio and funeral directors. The library at

the western end of the centre is open every day except Wednesday and Sunday, although has reduced opening hours on some days of the week.

6.9 There are seven companies using ground floor units in the town centre as (B1) offices for their small businesses. There is a cluster at the western end of the centre, and others scattered throughout. Combined with the presence of showroom type units these do break up the retail frontage, but also add employee footfall to the high street. Businesses trading from this type of premises should be encouraged to provide active ground floor frontages to their units, and any further change of use to B1 office should be treated with caution.

Change in Use Class Composition

6.10 Drawing on previous data provided by Epsom & Ewell Borough Council, we are able to compare the change in Use Class composition across Ewell Village between the period 2011-2019. Table 6.2 shows that there has been very little change in the composition of shop units within the Use Class A1-A5 categories when analysed by percentage proportion. The proportion of those retail businesses in Use Class A1 has risen marginally since 2011, whilst the proportion of those in Use Class A2 has fallen. The remaining A classes are unchanged (by %).

Table 6.2 Retail & services use change in Stoneleigh district centre, 2011-19

	No.of Businesses 2019	% of Total 2019	No.of businesses 2011	% of Total 2011	Difference (No.of Businesses)
Use Class A1	36	61%	40	59%	-4
Use Class A2	9	15%	12	18%	-3
Use Class A3	6	10%	7	10%	-1
Use Class A4	2	3%	2	3%	0
Use Class A5	6	10%	7	10%	-1
Total Use Class A1-A5	**59**		**68**		
Other	**17**		**5**		
TOTAL	**76**		**73**		

Source: Urban Shape site visits, September 2019 and E&EBC land use maps, 2011

The total number of businesses has increased by three (73 to 76) because three previously large units have sub-divided.

6.11 It is evident, however, that numerically the number of businesses in the Use Class A1-A5 category has fallen by nine from 68 in 2011 to 59 in 2019. This has led to a stronger representation of non-retail businesses on the high street – 17 in total compared to just 5 in 2011. As set out earlier, these uses include offices, health services, the library, a dance academy/studio, an art club, betting office and one vacant unit. The increase in B1 office uses has been the most significant change, introducing a shift away from active shop frontages; however, these are concentrated in the block near the train station adjoining the library creating a 'trade' destination for bathrooms, plumbers and electrical contracting.

6.12 An Article 4 Direction introduced in October 2015 removed permitted development rights from Use Class A1 to Use Class A2, but this does not extend to the full shopping area (see plan below). The evidence suggests that the Article 4 Direction has been successful in preventing the growth / over proliferation of Use Class A2 businesses.

Stoneleigh Broadway Article 4 Direction Boundary (Defined October 2015)



Proportion of vacant street level property

6.13 The on-site audit undertaken in September 2019 identified only one vacant unit (see Table 6.1). This is a vacancy rate of just 2% compared to a national average of 12%, which is a particularly strong vitality indicator. The vacant unit is located on the western side of the station, separated from the main high street – The Broadway. The unit has been boarded up, with the hoarding defaced with graffiti.

Pedestrian flows

6.14 Pedestrian flows are reasonably well distributed throughout the town centre given plentiful free on-street parking for up to two hours along the full extent of the high street. The Sainsbury's Local, Co-Op, Post Office and independent convenience stores effectively anchor the eastern and central part of the high street, whilst the train station and pub (with two rear pay & display car parks) drive footfall to the eastern end. The central and eastern parts of the high street were viewed to be busier around the key anchor retailers and services.

Accessibility

6.15 Stoneleigh Broadway train station is located at the western end of the district centre with egress/access directly onto The Broadway high street, and also onto Station Approach (on the western side) and a very small parade of shops. The station sits on the Epsom to Waterloo via Clapham Junction line. The journey time to Epsom is six minutes, whilst in the London direction, Wimbledon is reached in 13 minutes, Clapham Junction in twenty minutes, and Waterloo in just over half an hour. Services are operated by South Western Railway and run every thirty minutes during the daytime.

6.16 The centre is only served by one bus route – the E16 circular route which runs between Epsom Town Centre and Worcester Park via Ewell and Stoneleigh. The route runs to an hourly frequency, alternating between running in a clockwise and anti-clockwise direction.

6.17 Car parking in the district centre is good and readily available. The majority of parking provision is provided in the form of free (up to 2 hours) on-street bays along the full stretch of the high street. Two additional small pay and display surface car parks are located at the western end of the centre, both adjacent to The Station public house. At the time of our visit, the free on-street parking was well-used, but the pay & display surface car parks were observed to be completely empty, and likely to be used only at peak times when on-street parking is at full capacity. Short stay free car parking supports the vitality and viability of the district centre and its role for local top up shopping.

Perception of Safety & Occurrence of Crime

6.18 Crime statistics published by Surrey Police provide a snapshot of crime levels in the district centre over the three months to July 2019 (Table 5.3). Instances of reported crime in the district centre are relatively low, although consistently across all three months instances of anti-social behaviour were reported on Station Approach, including five incidents reported in the month of July 2019.

Table 5.3 Reported crime in Stoneleigh district centre, May-July 2019

	May 2019 reported incidents	June 2019 reported incidents	July 2019 reported incidents
Anti-social behaviour	1	7	2
Public order	0	0	0
Theft	0	4	0
Burglary	1	1	0
Shoplifting	0	0	2
Criminal damage & arson	0	0	0
Other crime	2	1	1
Total	**4**	**13**	**5**

Source: Surrey Police website, September 2019

Environmental Quality

6.19 The environmental quality of the centre is generally positive, with wide pavements creating a safe environment and encouraging pedestrian movement around the centre. The purpose-built high street provides a broadly uniform architectural style which ensures a consistent height and red brick appearance with signs of 1930's arts and crafts style facades. Whilst there are always opportunities to invest and enhance the public realm, there is seating, tree planting, pavement flower planters and attractive lamp posts.

6.20 Adjacent to the main entrance to the railway station is a small building, likely a former public toilet block, which is no longer in use and has been boarded up. This creates a negative first impression on arrival into the centre from this direction, and the Council may wish to explore options to bringing it back into active use in a form of development which may benefit users of the centre and railway station, for example a take-away coffee kiosk. The small parade of units on the western side of the station has a noticeably lower environmental quality with a prominent vacant unit, poor quality shopfronts and a general feeling of neglect compared to the eastern side of the centre.

Summary

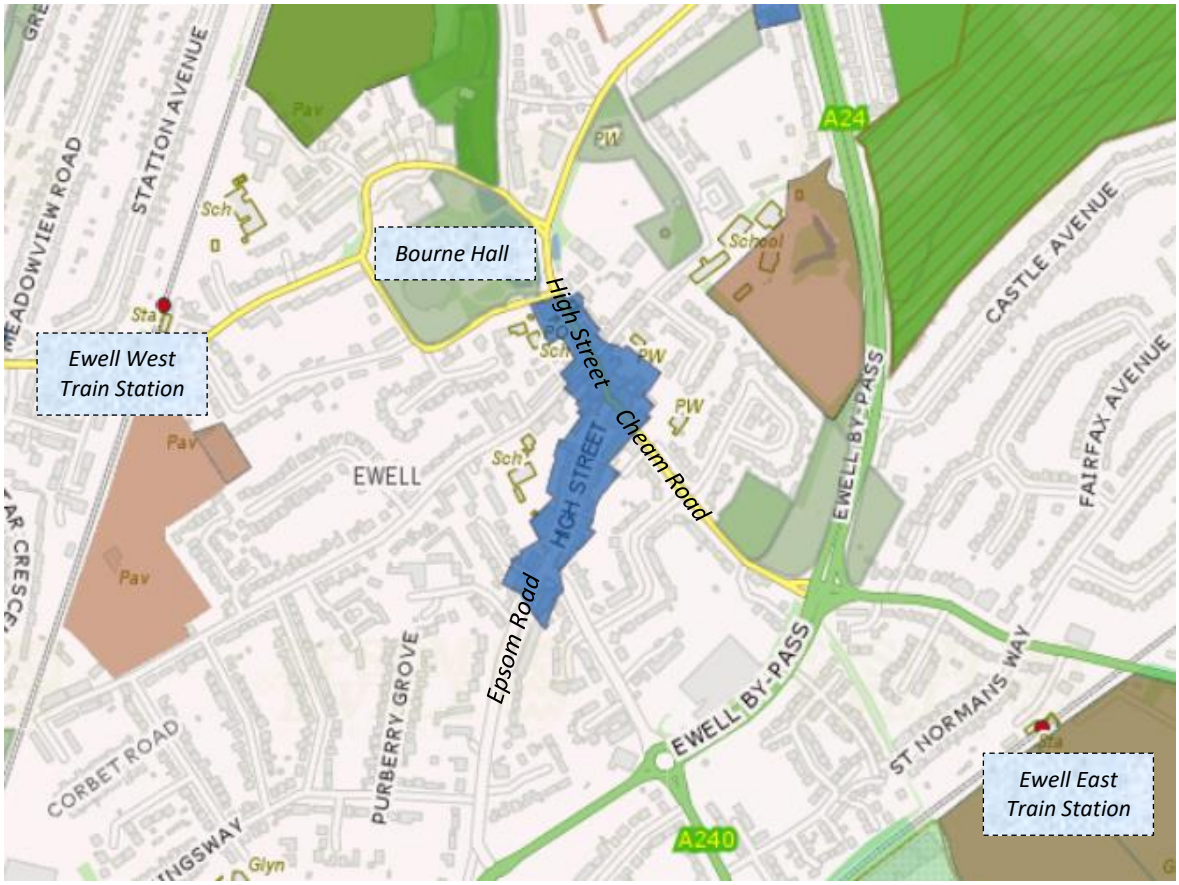
- Stoneleigh Broadway is a wide and pedestrian friendly high street, comprising 62 shop units and benefitting from a plentiful supply of free car parking. The range of shop business is strong offering pharmacies, pet shop, two small convenience stores, a good selection of independent convenience stores, Post Office, dry cleaners, hair and beauty, shoe repair, cafes, restaurants, doctors, dentist and taxi office, for example. Community facilities include the library, dance studio and art studio, and the vacancy rate is particularly low.
- The composition and mix of retailing in the Use Class A category (in % terms) has changed very little over the last 8 years, even – in the face of national trends – experiencing a small increase in Use Class A1 and a decrease in Use Class A2. The key change has been the overall decline in the *number* of businesses in the Use Class A1-A5 categories, with non-A Class businesses now totalling 17 compared to just 5 in 2011. Many of these businesses provide active street frontages and generate town centre shopper footfall including the art club, dance studio, doctors, dentist, and library, for example; but the area of concern is the strong rise in Use Class B1 office space at ground floor. These introduce non-active frontages and any further growth will dilute retail frontages in what is currently a strong and healthy town centre.

7. Ewell Village

7.1 Ewell Village is defined as a Secondary Town Centre in the adopted Development Plan. Lying north-east of Epsom town centre and south of Stoneleigh Broadway, Ewell Village is predominantly linear in nature, running north to south along Epsom Road/High Street, with a small continuation of units on Cheam Road. The up-to-date audit undertaken in September 2019 has identified 66 shop units.

7.2 The town centre lies entirely within the Ewell Village Conservation Area (designated in 1972), and in February 2000 an Article 4(2) Direction was served on all residential properties in the conservation area introducing greater planning control. As noted in Section 2, there are a large number of listed buildings within the Ewell Village boundary, predominantly located on the northern stretch of 'High Street' and around the junction of High Street with Cheam Road/West Street/Church Street. There are also four listed buildings on the southern stretch of 'High Street' (eastern side).

Ewell Village Boundary and Context Plan [Proposals Map Extract]



7.3 Adjacent to the north-western boundary of the centre is Ewell's largest landmark – Bourne Hall, a council-operated facility, housing a library and a mixture of permanent and temporary exhibitions on local history. It is a modernist circular structure also offering a pay & display car park, library and performance and community space for a large range of local activities and clubs. It was Grade II listed by English Heritage in 2015 for reasons of architectural interest.

7.4 The historic foundations of Ewell Village are evident in the built form, but heavy road traffic detracts from the pedestrian environment and ease of shopper movement throughout the centre. These findings are endorsed in the Ewell Village Conservation Area Character Appraisal. The B2200 runs as a through-route from the A24 by-pass towards Ewell West and Horton/Chessington; and three further routes travel towards Ewell Village from the A24 including London Road, Reigate Road and Epsom Road.

7.5 The surrounding area is characterised by low density detached and semi-detached housing, with additional facilities in close proximity including St Mary the Virgin Ewell Parish Church, Ewell Castle School, Glyn secondary school, Ewell West and Ewell East train stations, Homebase and Tesco Esso Express on the A24 by-pass. Ewell is predominantly suburban in character, with the high street performing as the often-congested commercial centre.

Diversity of Uses/Retailer Representation

7.6 Within the defined Village boundary, 74 units were recorded at ground floor level, although 8 of these are not identified by Experian Goad as a retail, service or leisure use, instead being recorded as office (B1) or health care service (D1). Table 7.1 below sets out the diversity of uses in Ewell Village compared to the national average in respect of typical town centre composition.

Table 7.1: Diversity of Uses in Ewell Village Secondary Town Centre, 2019

	Number of units	% of Total	UK Average %	Different to UK Average %
Convenience Retail	3	5%	10%	-5%
Comparison Retail	16	24%	39%	-15%
Retail & Leisure Services	42	64%	38%	+26%
Vacant Units	5	8%	13%	-5%
Sub-total	**66**	**100%**	**100%**	**-**
Other (Offices/Health Services)	8	-	-	-
Total units	**74**	**-**	**-**	**-**

Source: Urban Shape site visits, September 2019

7.7 The proportion of comparison goods units in Ewell Village is substantially lower (-15%) than the national average, although this is perhaps consistent with its 'secondary' – and lower order – status. Unusually in secondary centres there is, however, a good representation (6 units) of ladieswear and children's clothing shops trading as independent, specialist and boutique businesses. These include accessories, specialist hats (millinery), clothing and footwear and a specialist dance shop stocking dance shoes, dance, ballet and gymnastics clothing and bridal/wedding shoes.

7.8 There are no comparison goods national multiple retailers in Ewell Village, but other businesses represented include two chemists, an optician, an art gallery and picture framing, a pet supplies shop, a florist, a charity shop, a kitchen showroom, computer repairs and homewares shop. In total there are 16 comparison goods operators in Ewell Village out of a total of 74 businesses.

7.9 The proportion of convenience goods businesses is lower than the national average (-5%), providing just three foodstores. These do, however, provide a good mix of supermarket, top-up convenience and newsagents, and include a Sainsbury's Local, Co-Op and Safegate News. The small Sainsbury's store is dated with stock range limited in a 'Local' format store. It does have direct pedestrian access to Cheam Road - opposite the main car park – and to High Street, providing a good footfall generator to the central part of the Village. The foodstore closes at 11.30pm Monday to Saturday, and 10.30pm on a Sunday.

7.10 Ewell Village has no independent or specialist convenience stores, i.e. butchers, bakery, greengrocers or off licences. This absence in representation restricts the overall diversity and attractiveness of the town centre, limiting the range and quality of convenience goods on offer.

7.11 Retail and Leisure Services account for 64% of total businesses in Ewell Village (42 units in total), representing the dominant type of trading activity in the town centre. The largest number of businesses

(24) fall within the Retail Services category and is very much dominated by hair and beauty operators (14) including seven beauty salons, three barbers and four hairdressers. Other retail services include clothing alterations, two dry cleaners, two estate agents, a funeral directors, pet grooming, a post office, tattoo parlour and travel agent. There are no banks or buildings societies, but the Post Office has an external wall ATM cash machine; HSBC closed around 8 years ago, whilst Barclays closed in 2015 to be replaced by Costa Coffee.

7.12 There are 18 Leisure Services throughout the village centre, including five cafés, eight restaurants, two betting offices, one public house and two take-aways. The balance towards cafés and restaurants rather than take-aways is a positive vitality indicator, with key long-standing businesses including All Things Nice café, Millroys café, Costa Coffee, the Green Man public house, La Familia Italian, and Hanedan Turkish restaurant. A large unit was occupied by 'The Lounge' on High Street for a short period of time, but closed less than a year after opening. The unit was previously a large furniture shop but currently remains vacant.

7.13 Other businesses falling outside of the retail and leisure categories, but which do add diversity to the town centre, include a taxi office, dentist, physiotherapist, chiropractor, and four offices including loft conversions and alarms.

Change in Use Class Composition

7.14 Drawing on previous data provided by Epsom & Ewell Borough Council, we are able to compare the change in Use Class composition across Ewell Village between the period 2011-2019. Table 7.2 highlights that there has been a considerable loss of Use Class A1 over this period. The two surveys suggest that the decline of Use Class A1 has been the primary cause of a reduction in the total number of retail businesses in Ewell Village from 70 in 2011 to 57 in 2019 (A1-A5 combined).

Table 7.2: Retail Use Class Composition, Ewell Village, 2011-2019

	No. of Businesses 2019	% of Total 2019	No. of Businesses 2011	% of Total 2011	Difference [No. of Businesses]
Use Class A1	32	56%	50	71%	-18
Use Class A2	9	16%	8	11%	+1
Use Class A3	13	23%	8	11%	+5
Use Class A4	1	2%	3	4%	-2
Use Class A5	2	4%	1	1%	+1
Total Use Class A1-A5	**57**		**70**		**-13**

Source: Urban Shape site visits, September 2019 and E&EBC land use maps, 2011

7.15 Two public houses (Use Class A4) have permanently closed (King Willian IV and The Star), with one being replaced by an Italian Restaurant (Use Class A3). The proportion of Use Class A2 and A3 across the town centre has increased significantly over the eight-year period, demonstrating a significant change in composition. It is relevant to note that over half of Use Class A1 businesses have not been subject to a change of use to A2-A5 categories, but have instead been converted to offices, health services, showrooms, residential, other Sui Generis or remain vacant.

7.16 Analysis of the land use audits highlight an increase of just one 'Use Class A2' business, but it is important to emphasise that the figures hide trends within this category. In particular, the nine Use Class A2 businesses comprise seven beauty salons, which replaced (numerically) a more varied representation of

betting shops (in 2011 these were Use Class A2 but are now Sui Generis), two banks and a selection of estate agents. The diversity of uses in this category has shrunk considerably. An Article 4 Direction introduced in October 2015 removed permitted development rights from Use Class A1 to Use Class A2, but this does not extend to the full shopping area (see plan below).

Ewell Village Article 4 Direction Boundary (Defined October 2015)



NB: Removes permitted development from Use Class A1 to Use Class A2

7.17 Ewell Village has experienced an overall reduction of 13 retail/leisure units (A1-A5) since 2011, with a noticeable loss around the junction of Cheam Road and High Street. This junction area has diluted the 'flow' and connectivity of the centre, inserting a separation within the frontage between north and south. Key footfall drivers in this location previously included HSBC bank, The Star Public House, Williams Convenience Store, and a wooden furniture shop – all of which have now closed and either remain vacant or have been converted to offices and/or residential.

Ewell Village Area of Diluted Retail/Leisure Activity and Frontage Separation



Vacancy Rate

7.18 Five vacant units were recorded in the Village centre (September 2019). This equates to a vacancy rate of 8%, substantially below the national average of 13% (Table 7.1 above). Two units, previously occupied by The Lounge (bar) and St Raphael's charity shop, are located on the main southern stretch of Epsom Road/High Street. The Lounge is a particularly large unit, previously occupied by a furniture retailer. The former Williams Convenience Store, Sugar Craft/Cake shop, and Easton's Estate agents are all located around the High Street/Cheam Road junction – an area which has experienced a dilution of retail and leisure uses in recent years.

Accessibility

7.19 Ewell is served by two railway stations – Ewell West and Ewell East – each of which is approximately ten minutes' walk from the district centre. Ewell West is served by half-hourly services on the Epsom to Waterloo line, in common with Stoneleigh. Ewell East is served by trains every 30 minutes to London Bridge via Sutton and West Croydon, with a journey time to Sutton of 6 minutes; West Croydon 20 minutes and London Bridge 40 minutes. It is also served by trains every 30 minutes to London Victoria via Sutton (40 minutes).

7.20 Ewell Village benefits from a good level of accessibility by bus, being served by three bus routes which each operate at approximately 20-minute intervals throughout the day:

- Route 293, which runs between Morden and Epsom General Hospital via North Cheam and Epsom town centre [bus stop adjacent/opposite Green Man public house];
- Route 406, which runs between Kingston and Epsom via Surbiton and Tolworth [bus stop adjacent/opposite the Green Man public house];
- Route 470, which runs between Colliers Wood and Epsom via Morden and Sutton [bus stop adjacent/opposite the Green Man public house].

7.21 Ewell Village is also served by the E16 circular route, details of which are provided in the Stoneleigh health check. The centre is also served by an hourly bus (route 467) which runs between Epsom and Hook via Chessington.

7.22 There are three public car parks serving the district centre[3]:

- Rear of High Street – parking cost 80p for two hours, 46 spaces, access road off Cheam Road;
- Dorset House, Cheam Road – parking cost 80p for two hours, 68 spaces. Directly opposite Sainsbury's entrance, accessed from Cheam Road;
- Bourne Hall – parking cost £1.20 for two hours, 101 spaces.

7.23 The number of spaces provided across the three car parks is considered satisfactory, although the car park at Bourne Hall is more detached from the centre and is primarily used by those visiting Bourne Hall, the park/pond area and GP practice/health service facilities adjacent. There is free on-street parking at the southern end of the town centre, at the junction of Epsom Road/Reigate Road, and also outside Co-Op convenience store.

Pedestrian flows

7.24 The central part of the Village (i.e. the southern part of High Street between its junctions with Cheam Road and Epsom Road) benefits from good levels of pedestrian activity, driven by key anchors including Co-Op, Costa Coffee, Dancia, Opticians, pharmacy and All Things Nice café. Free on-street parking at the southern most point of the Village assists in pedestrian movement along this full stretch of prime frontage.

7.25 Pedestrian footfall was observed to decrease considerably on the northern stretch of High Street, north of the junction with Cheam Road. The busy road junctions (High Street with Cheam Road) combined with the more fragmented retail frontage, the poorer quality of many of the units, and a lack of retail attractors are all likely to contribute to the lower levels of footfall. The only daytime footfall driver in the northern part of the Village is the Post Office, the Ewell Spring Pharmacy and to a lesser extent Skin Secrets Beauty Salon.

Perception of Safety & Occurrence of Crime

7.26 Crime statistics published by Surrey Police provide a snapshot of crime levels in the town centre over the three months to July 2019, which are summarised below in Table 7.3 (Source: Surrey Police). The table shows that reported crime within the vicinity of the Village centre was low across each of the three months, indicating that the centre does not suffer from a high crime rate.

Table 7.3 Reported crime in Ewell Village district centre, May-July 2019

	May 2019 reported incidents	June 2019 reported incidents	July 2019 reported incidents
Anti-social behaviour	1	0	0
Public order	2	0	0
Theft	0	0	5
Burglary	0	0	0
Shoplifting	1	0	0
Criminal damage & arson	0	1	1
Other crime	4	3	0
Total	**8**	**4**	**6**

[3] Parking spaces and costs sourced from Parkopedia, information correct as of September 2019

Environmental Quality

7.27 The 'Ewell Village Conservation Area Character Appraisal' (2009) describes the wider conservation area – which includes the town centre boundary – as follows:

> *"The Ewell Village Conservation Area lies to the north-east of Epsom town centre, on the line of the A24 (Roman Stane Street) which connects Dorking to London but which now bypasses the village. The extensive conservation area includes the historic Bourne Hall Park, now centred on the 1960's public library, and the ponds and watercourses which once served two mills. A notable collection of listed buildings form the core of the village, with the best and most complete townscape in Church Street. Despite much Inter-War development, Ewell retains a rural quality due to its many open green spaces, reinforced by the woodland which stretches along the line of the emerging river Hogsmill." (page 1)*

7.28 Character Area 3 of the Conservation Area Appraisal focuses on Ewell Village centre, describing it as included the busy village centre and crossroads, the main shopping street (High Street) which leads towards Epsom, and the 1930's commercial properties at the northern end of Epsom Road. The document notes that:

> *"there are many listed buildings facing the cross-roads created by West Street, London Road, Church Street and High Street, some of them surprisingly vacant and 'at risk'. Along High Street, small vernacular cottages are somewhat dwarfed by insensitive development of the 1960's and later, which makes up a substantial proportion of the west side of the street. However, this area retains a large number of surviving features which relate to the historic Surrey village of Ewell."*

7.29 Overall, Ewell Village appears well used, but the pedestrian environment is challenged by the heavy vehicular traffic passing through the main High Street. A number of historic buildings reflect the history of the area and village centre, but this is interspersed with more modern and less attractive 1960's+ development. Many shop façade's and listed buildings appear run down and in need of repair and maintenance, with vacant units contribute to a 'run-down' feel around the main High Street/Cheam Road cross-roads. The quality of the paved areas and on-street parking areas is generally of poor quality throughout the town centre, detracting further from the pedestrian environment.

7.30 The former HSBC bank has under-gone refurbishment, but whilst improving the environmental quality of this view, the previous retail use has been lost to office/commercial. The building is not listed, benefitting from a more flexible approach to investment and enhancement. There are signs of further investment in this area, with some residential conversions and building refurbishments including The Star (listed building) (previous Public House). The introduction and growth of town centre living would contribute to footfall and the wider health of the town centre. Further investment in the Village's listed buildings would also contribute to the environmental quality and overall historic appearance of the village centre.

Summary

- Ewell Village has 66 retail/leisure business operators offering a good mix of key services and retail categories required for people's day-to-day needs. These include chemists, opticians, pet supplies, dry cleaners, Post Office, taxi office, florist, dentist, two small convenience stores and a newsagent, and a good selection of cafés, restaurants, hairdressers and beauty salons. Unusually for a smaller centre, Ewell Village has a selection of clothing and specialist comparison goods operators including a millinery hat designers and dance/ballet/gymnastics clothing and accessories.

- A comparison between the 2011 and 2019 land use surveys has, however, identified a number of changes which should be responded to in the new Local Plan. In particular, the number of retail/leisure businesses has fallen from 70 to 57, with the decline of A1 uses being the primary cause – either through change of use to A2-A5 or to residential, offices, health services and showrooms. Whilst the proportion of Use Class A1 has fallen significantly, the proportion of Use Class A2 and A3 businesses has grown. The increase in beauty salons in the A2 category has been a strong trend, and there are no longer any banks or financial services present; but the number of vacant units and take-aways across the centre is particularly low.
- A key change in the centre has been a noticeable loss of retail/leisure activity around the junction of Cheam Road and High Street. Combined with heavy traffic, this junction area has diluted the 'flow' and connectivity of the centre, inserting a separation within the frontage between north and south. The only key footfall drivers in the north of the centre are the Post Office and Ewell Spring Pharmacy, whilst the southern part of High Street remains the prime retail frontage. Observations of pedestrian footfall indicate that few people visit north and south during the same shopping trip/visit.

8. Quantitative Need

8.1 In this section we set out our assessment of the need for additional convenience and comparison goods retail floorspace across the borough. We set out the performance of existing floorspace as the basis for forecasting the need for additional retail floorspace to the period 2032, incorporating interim years of 2022, 2027 and 2032. The quantitative tabulations accompanying this assessment are set out in Appendix 2 (convenience) and 3 (comparison).

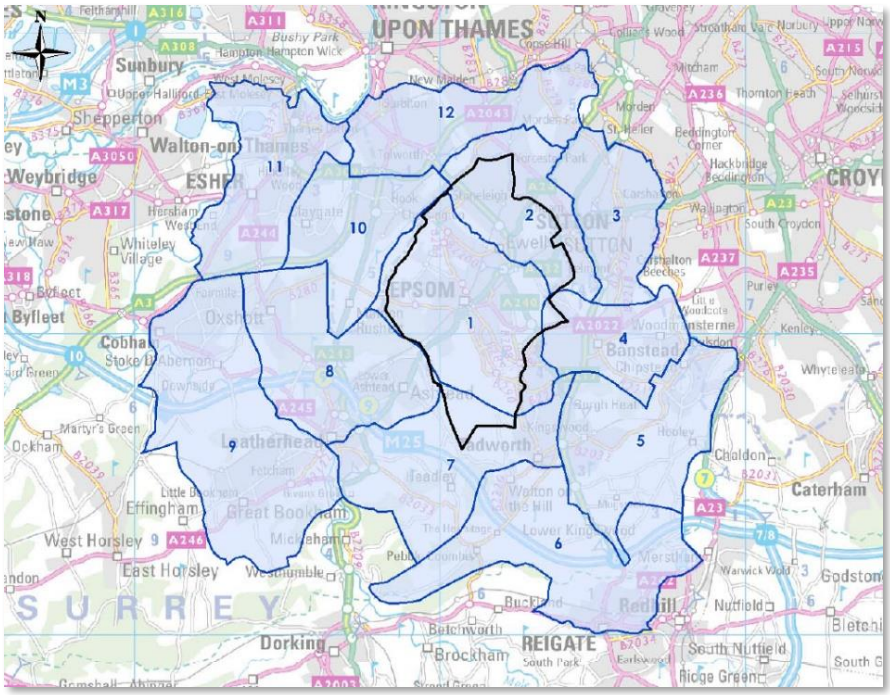
8.2 We have used a conventional and widely accepted step by step methodology, drawing upon the results of the household telephone survey of existing shopping patterns (2019) to model the existing flows of available expenditure to the network of centres and edge/out-of-centre retail provision. To develop the baseline, we have:

- Calculated the total amount of convenience and comparison goods expenditure which is available within the postcode areas comprising the Epsom & Ewell study area;
- Allocated the available projected expenditure to the convenience and comparison goods shopping destinations, on the basis of the household telephone survey of shopping patterns so as to provide estimates on current sales and forecasts of future sales;
- Compared the total expenditure attracted to each shopping destination with current retail floorspace to assess sales densities/performance in each shopping destination.

8.3 Building on the baseline position, we have explored the need for further convenience and comparison retail floorspace within the Borough, having regard to the identified performance of existing floorspace.

Survey Area and Household Telephone Survey

8.4 In order to identify shopping patterns across the Borough, Urban Shape commissioned a new household telephone survey covering 1,200 households across 12 survey zones. Urban Shape designed the survey questionnaire in consultation with the Council and NEMS Market Research, who undertook the interviewing and data processing in September 2019. The survey area is shown below.



8.5 The survey results (2019) identify shopping habits of households for both convenience and comparison goods. Where necessary, survey results have been rebased to remove some responses (such as 'don't shop for particular goods' and 'internet shopping') to ensure consistency with categories excluded in the expenditure projections.

8.6 For convenience goods, the household telephone survey included questions on main food and top-up food shopping. The results of the two types of food expenditure were then merged through the application of a weight which reflects the estimated proportion of expenditure accounted for by each goods type (70% main food / 30% top-up food). This forms a composite pattern of convenience spending, expressed as a market share for each destination centre or foodstore for each survey zone.

8.7 The household telephone survey also included seven questions on where respondents normally undertake shopping for the following comparison goods types, which coincide with Experian Business Strategies definitions of comparison goods expenditure:

- Clothing and footwear;
- Furniture, floor coverings and household textiles;
- DIY and decorating goods;
- Domestic appliances;
- Audio-visual equipment;
- Personal and medical goods; and
- Recreational and luxury goods.

8.8 In order to determine the composite market share for all comparison goods spending within the survey area, we apply the weighted averages of the household telephone survey results for each goods type based on the proportion of per capita spend on that goods type. This process establishes the pattern of comparison spending for residents in each of the survey zones and is an accepted approach which ensures that market shares for centres and stores are not skewed by any particular goods category.

Population

8.9 Population estimates and forecasts for each of the survey zones are derived using the Experian E-Marketer in-house system. This provides estimates of population based on trend-line projections and the 2011 census for small, localised areas. Overall, the population of the survey area in 2019 is estimated to be 508,473. It is forecast to grow to 524,365 by 2022, 548,712 by 2027, and 570,139 by 2032. This represents an overall increase of 13% over the course of the assessment period.

Available Expenditure in the Survey Area

8.10 The Experian E-Marketer system provides estimates of per capita expenditure for convenience and comparison goods expenditure in 2017 prices. We have made deductions for Special Forms of Trading (SFT) which represent expenditure not available to spend in shops (for example internet or catalogue shopping). The deductions we have applied for SFT for convenience and comparison goods are derived from Experian Retail Planner Briefing Note 16 and are discussed in more detail in Section 3.

8.11 To estimate available expenditure in the survey area, we have applied growth rates based on economic forecasts published by Experian Business Strategies (Retail Planner 16). For convenience goods we have applied growth rates of 0.1% per annum across the assessment period; and for comparison goods we have applied more varied growth rates of 2.8% between 2019 and 2020, 3.3% between 2020 and 2025, and 3.2% onwards.

8.12 Experian note that retail spending will remain on a slower growth trajectory over 2019 and 2020 as consumer confidence will remain vulnerable to the uncertainty surrounding Brexit. The longer-term

outlook for convenience goods remains stable at 0.1% and whilst weaker than recent trends, it remains comfortably above the exceptionally weak performance seen during 2007-2014. For comparison goods, the recovery beyond 2020 is expected to gather momentum, but it will be well below the pace of the pre-2007 boom (up to 8.2%) due to wider national and international economic constraints.

8.13 Using the growth rates above and applying relevant deductions for SFT, total available expenditure across the survey area has been grown in five-year intervals (including 2022, 2027) up to 2032. Appendix 2, Table 3 applies per capita expenditure to the population forecasts, which indicates that total available convenience goods expenditure within the survey area is £1.116 billion (2019). This is forecast to grow to £1,162 billion by 2022, £1,216 billion by 2027, and to a total of £1,264 billion by 2032. This equates to an overall growth of £147.6m between 2019 and 2032 (14% growth) (Appendix 2, Table 3).

8.14 Comparison goods expenditure within the survey area at 2019 is £2.056 billion. This is forecast to grow to £2.275 billion by 2022, £2.746 billion by 2027, to a total of £3.323 billion by 2032. This equates to an overall growth for comparison goods expenditure in the survey area of £1,267 million between 2019 and 2032 (62% growth) (Appendix 3, Table 3).

8.15 Longer term projections should be treated with caution due to the potential for changing economic circumstances and growing margins of error over the longer term.

Convenience Goods: Turnover/Shopping Patterns

8.16 Key foodstore provision in the Borough includes the Aldi in Kingston Road Local Centre, Waitrose and M&S in Epsom Town Centre, the Sainsbury's Local and Co-Op in Stoneleigh Broadway, and the Sainsbury's Local and Co-Op in Ewell Village. The main out-of-centre foodstore is the Sainsbury's superstore at Kiln Lane, and there is a network of smaller Tesco Express and Co-Op stores located throughout the borough either in out-of-centre or local centre locations. Table 8.1 lists the main foodstores in the borough by turnover derived from the survey area (Zone 1-12).

Table 8.1: Most Popular Foodstores in Borough by Turnover

	Foodstore	Turnover (£m)	Sequential Location
1	Sainsbury's, Kiln Lane	£81.3m	Out of Centre
2	Aldi, Kingston Road	£37.7m	Local Centre
3	Waitrose, Ashley Centre, Epsom	£12.2m	Town Centre
4	Sainsbury's Local, The Broadway, Stoneleigh	£9.8m	District Centre
5	M&S, Ashley Centre, Epsom	£6.4m	Town Centre
6	Co-Op, Green Lanes, Chessington Road	£5.6m	Local Centre
7	Co-Op, The Broadway, Stoneleigh	£5.6m	District Centre
8	Tesco Express, Horton	£5.1m	Out-of-centre
9	Co-Op, Ruxley Lane, West Ewell	£5.0m	Out-of-Centre
10	Tesco Express, Epsom Station	£4.8m	Town Centre
11	Sainsbury's Local, Ewell Village	£3.3m	District Centre
12	Co-Op, Kingston Road	£3.2m	Local Centre
13	Tesco Express, Ruxley Lane	£3.1m	Local Centre
14	Tesco [Esso] Express, Reigate Road	£3.0m	Out-of-Centre
15	Co-Op, Upper High Street, Epsom	£2.4m	Town Centre
16	Co-Op, High Street, Ewell Village	£1.9m	District Centre
17	Co-Op, Station Approach, Epsom	£1.6m	Town Centre

8.17 Table 10.1 highlights the Sainsbury's at Kiln Lane to be the most popular foodstore, with a turnover of £81.3m. This if followed by the relatively new Aldi foodstore (Opened 2017), Waitrose in the Ashley Shopping Centre, Sainsbury's Local in Stoneleigh, and M&S in the Ashley Shopping Centre. The Aldi foodstore is located on the A24 bypass with good passing trade and connectivity across the borough; it has had a substantial influence on shopping patterns since opening in 2017. The out-of-centre Sainsbury's continues to be the most dominant foodstore in the Borough – consistent with the findings of both the 2009 Retail Study and 2015 Retail Study Update.

8.18 Within the Survey Area (Zone 1-12), the borough network of foodstores combined (listed in Table 5b, Appendix 2) have a 17.2% market share. This low trade retention is not a cause for concern given the extent of the survey area boundary and localised nature of convenience goods shopping. It is therefore relevant to focus on local trade retention levels within Zone 1 and 2, the zones most closely related to Epsom and Ewell's borough boundary.

8.19 For main food shopping, residents of Zone 1 are predominantly using Sainsburys Kiln Lane (49%), Aldi Kingston Road (10.8%), Asda Burgh Heath (10.1%), Waitrose Epsom (4.9%) and Waitrose Banstead (4.2%). For top up food shopping, the choice of foodstore – as you would expect – is considerably more varied. Residents of Zone 1 are predominantly using Waitrose Epsom (11.5%), Sainsburys Kiln Lane (9.7%), Co-Op Ewell Village (9.7%), Co-Op Ruxley Lane (9.7%), Tesco Express Esso Garage (5.8%), Tesco Express Horton (6.2%), Sainsbury's Ewell Village (3.8%), Tesco Express Ruxley Lane (3.5%) and M&S Epsom (3.5%).

8.20 Within Zone 1, the main foodstores in the Borough have a 67% market share, drawing £92.2m of a total £137.7m available. The remaining Zone 1 trade (33%) is accounted for by 'other' stores outside of Epsom & Ewell borough including the Asda Burgh Heath, Waitrose Banstead, Lidl Leatherhead, Tesco Extra New Malden and Tesco Leatherhead – amongst others (see Table 5, Appendix 2). It should be noted, however, that no foodstore outside of the borough has a substantially strong – and therefore competitive – market share. It would not seem necessary to aspire to 'claw back' any level of lost trade to floorspace outside of the borough, with most patterns reflecting geography rather than 'leakage'.

8.21 For main food shopping, residents of Zone 2 are predominantly using Sainsbury's North Cheam (28.3%), Sainsbury's Epsom (15.3%), Aldi Kingston Road (9.5%), Waitrose Worcester Park (6.6%), Sainsbury's Worcester Park (7.2%), Tesco Extra Sutton (7.0%), Waitrose Banstead (4.7%), Sainsbury's Local Stoneleigh (4.2%), and Co-Op Stoneleigh (4%). For top up food shopping, residents are predominantly using Sainsbury's Local Stoneleigh (12%), Waitrose Cheam (11%), Co-Op Stoneleigh (10.5%), Sainsbury's Superstore North Cheam (6.9%), and Sainsbury's Local Worcester Park.

8.22 Zone 2 has a larger geographical area lying outside of the Borough. The main foodstores in the borough consequently have a lower market share (35%) than Zone 1 (67%). The remaining Zone 2 trade (65%) is accounted for by 'other' stores outside of Epsom & Ewell borough including Sainsbury's North Cheam, Waitrose Worcester Park, Sainsbury's Local Worcester Park and Tesco Extra Sutton. Again, these lie within or adjacent to Zone 2 and reflect geography rather than borough 'leakage'.

Epsom Town Centre: Convenience Goods Floorspace Performance

8.23 Our methodology estimates the trade draw and performance of foodstore destinations across the borough. Key foodstores in Epsom Town Centre include Waitrose and M&S Food in the Ashley Shopping Centre, and smaller format stores including Co-Op on Upper High Street, Co-Op on Station Approach and Tesco Express Epsom train station.

8.24 We estimate that the Waitrose, Ashley Shopping Centre has a convenience goods turnover of £12.9m. Based on a convenience goods floorspace of 1,186 sq m net we estimate that the Waitrose store has an average convenience goods sales density of £10,860 per sq m net. This is lower than company average sales (£13,431 per sq m net), but stronger than that identified in the 2009 Retail Study (£8,527 per sq m net). Given the town centre location, the recorded figure is likely to be buoyed by top up passing trade and local employee spending from those living further afield. The store is likely to be performing broadly

in line with company expectations, but the analysis is not reflecting an 'over-performing' foodstore. This is in line with our site visits and observations.

8.25 We estimate that the M&S Simply Food in the Ashley Shopping Centre has a convenience goods turnover of £6.7m. Based on a convenience goods floorspace of 897 sq m net, the store has an average convenience goods sales density of £7,490 per sq m net. This is lower than the company average sales density of £10,965 per sq m, but – like Waitrose – is higher than that recorded in the 2009 Retail Study (£6,489 per sq m net). Our observations on a number of site visits recorded the store consistently busy with high footfall and check-out queues. M&S town centre stores across the country benefit from linked trips with adjoining shops and lunchtime trade from local employees – spend that would not necessarily be picked up in a household telephone survey. We conclude that the store is performing well, and likely to have a turnover greater than that recorded.

8.26 The smaller format top-up stores in Epsom Town Centre are performing particularly well. The Tesco Express at Epsom train station has a sales density of c.£18,820 per sq m net, considerably higher than company averages (£12,911 per sq m net). The Co-Op on Upper High Street has a sales density of £14,290 per sq m net, whilst the Co-Op on Station Approach has a sales density of £11,570 per sq m net – both higher than the company average sales density of £8,269 per sq m net.

8.27 Overall, the data suggests that two main foodstores are performing slightly below company average levels, but on-site surveys, observations and the likely benefits of additional linked trip and employee trade indicate that both stores are performing well. The top-up smaller format foodstores are performing particularly well, being located close to the main transport interchange and large residential catchment areas.

Stoneleigh Broadway District Centre: Convenience Goods Floorspace Performance

8.28 Stoneleigh Broadway has two small format anchor foodstores – Co-Op and Sainsbury's, located on opposite sides of the high street, but both occupying prime pitches. The figures are suggesting a particularly strong performance of both stores, driven by good footfall and small format, efficient floorplates. Based on a net sales convenience goods floorspace of 238 sq m net we estimate that the Sainsbury's Local has an average sales density in excess of £40,000 per sq m. This is substantially above the Sainsbury's company average sales density of £12,191 per sq m, and likely helped by free on-street parking, limited competition and lengthy opening hours in close proximity to Stoneleigh train station.

8.29 The Co-Op store is a similar size. Based on a net sales convenience goods floorspace of 262 sq m we estimate that the Co-Op has an average sales density of around £21,000 sq m net. This is substantially above the Co-Op company average sales density of £8,269 per sq m; clearly playing a secondary role to the Sainsbury's Local, but still recording a strong performance. The analysis demonstrates the important role of both Sainsbury's and Co-Op to the wider town centre vitality and viability; with both stores being key anchors and identified footfall drivers.

Ewell Village District Centre: Convenience Goods Floorspace Performance

8.30 Like Stoneleigh Broadway, Ewell Village has two small format anchor foodstores – Co-Op and Sainsbury's, located on opposite sides of the high street, but both occupying prime pitches. Co-Op has a small amount of on-street parking outside, and Sainsbury's benefits from two adjoining pay and display car parks. The performance of the foodstores is strong albeit to a lower level than Stoneleigh Broadway. Based on a net convenience goods sales floorspace of 238 sq m net we estimate that the Sainsbury's Local has an average sales density of around £14,000 per sq m net. This is more in line with the Sainsbury's company average sales density of £12,191 per sq m net.

8.31 Based on a net convenience goods sales floorspace of 223 sq m we estimate that the Co-Op has an average sales density of around £8,700 per sq m net. This is in line with the Co-Op company average sales density of £8,269 per sq m net, again playing a secondary role to the Sainsbury's Local, but not to the same extent as that identified in Stoneleigh Broadway. The two foodstores in Ewell Village are both

commercially viable and performing in line with company expectations, helping to underpin the vitality and viability of Ewell Village as key anchor stores.

Other Key Town Centre Foodstores: Convenience Goods Floorspace Performance

8.32 The Aldi foodstore located in Kingston Road Local Centre is newly opened since the 2009 Retail Study and 2015 Retail Study Update. As noted earlier, the store has had a significant influence on shopping patterns across the Borough and is a well-used food shopping destination. The store draws trade from ten of the twelve survey zones albeit only small percentages in most zones. The strongest market shares are identified in Zone 1 (6.8%), Zone 2 (7.8%) and Zone 12 (5.7%) – those zones on the A24 by-pass.

8.33 We estimate that the store currently has a convenience goods turnover of £37.6m, the second highest turnover in the Borough. Based on this turnover, and with a net sales floorspace of 840 sq m, we estimate the sales density to be in excess of £44,500 per sq m net – the strongest performance identified in the Borough. Site visits observed the car park to be full and cars queueing on the A24 to enter.

Epsom & Ewell Out of Centre: Convenience Goods Floorspace Performance

8.34 The out-of-centre Sainsbury's foodstores is located on Kiln Lane, just off the A24 by-pass and equidistant between Epsom Town Centre and Ewell Village District Centre. The food superstore adjoins Wickes and Halfords and a wider area of industrial uses. The store achieves its highest market share in Zone 1 (35.3%), followed by Zone 2 (10.6%), Zone 4 (10.4%), and Zone 10 (6.3%). The food superstore draws trade from every zone except Zone 3 (Sutton catchment).

8.35 We estimate that the store currently has a convenience goods turnover of £83m, higher than the level recorded in the 2009 Retail Study (£62.8m), and almost three times the turnover of Epsom Town Centre's combined convenience provision. Based on this turnover, and with a net convenience goods sales area of 3,575 sq m net, we estimate the sales density to be c.£23,200, substantially higher than Sainsbury's company average of £12,191 per sq m net. The store is trading strongly, and consistent with the 2009 Retail Study, it is clearly the dominant foodstore in the Borough.

Convenience Goods: Quantitative Need

8.36 Based on population and expenditure growth, and the detailed performance analysis of existing floorspace, the analysis identifies a level of residual expenditure sufficient to support additional convenience goods floorspace across the borough. We have assumed an increase in sales efficiency rates for existing floorspace of 0.7% between 2019-2020, 0.4% between 2020-2021, 0.2% between 2021-2025, and 0% thereafter.

8.37 The analysis is based on existing floorspace and committed development i.e. those planning applications that have been granted planning permission but not yet constructed/open for trading. When open, these schemes will claim a proportion of residual expenditure and must therefore be taken into consideration when forecasting over the longer term. The one scheme identified is a new Lidl foodstore on Upper High Street in Epsom Town Centre, which will have a net convenience goods floorspace of 1,142 sq m, and a turnover of £8.2m based on a sale density of £7,098 per sq m net.

8.38 The projections are summarised in Table 7, Appendix 2, which indicates that by 2022 there will be an identified residual expenditure of £84.1m, set to grow to £94.1m by 2027 and again to £103.4m by 2032. Based on an average sales density of £12,000 per sq m net (grown according to recommended sales efficiency rates set out above), we forecast need for 6,920 sq m net by 2022, growing to 7,662 sq m net by 2027, and again to 8,420 sq m net by 2032. It should be noted that projections beyond 2027 should be treated with caution given growing margins of error over longer time periods, and an ongoing uncertain economy.

Comparison Goods: Epsom Town Centre Floorspace Performance

8.39 The comparison goods floorspace performance of Epsom Town Centre has improved considerably over the last 10 years. Table 4, Appendix 3 sets out Epsom Town Centre's market share across the survey area, highlighting variations in influence (on shopping patterns). It is evident that the area of influence is broadly similar to that identified in the 2009 Retail Study, extending across every survey zone but with a more limited market share in Zones 3, 11 and 12. Shoppers living in those northern zones instead continue to look towards Sutton, Kingston and retail warehousing in Purley Way and New Malden for their comparison goods shopping needs.

8.40 Within the survey area, Epsom Town Centre draws 10.5% of total available comparison goods expenditure (£216.9m). This is a strong increase since 2009 when a survey area market share of 6.6% was recorded, equating to a trade draw of £92.5m. Table 8.2 below sets out the market share of Epsom town centre within each survey zone, comparing the 2009 Retail Study outputs with the most recent evidence collated. The survey supporting the 2009 Retail Study was undertaken in November 2008, and the data therefore provides a comparison over an 11-year period.

Table 8.2: Foodstore Market Share Trend Data

Zone	2008 Market Share	2019 Market Share
Zone 1	26.9	37.3
Zone 2	4.9	14.1
Zone 3	0.0	1.0
Zone 4	9.9	13.9
Zone 5	2.0	5.6
Zone 6	2.9	7.1
Zone 7	18.3	27.7
Zone 8	20.0	21.4
Zone 9	5.2	4.9
Zone 10	3.6	4.6
Zone 11	0.0	2.0
Zone 12	0.1	1.1

2008 & 2019 Data sourced from NEMS Household Telephone Survey

8.41 It is evident from Table 10.2 that the market share of Epsom Town Centre has improved in every survey zone aside from Zone 9 which is located some distance from Epsom to the south west. Epsom Town Centre is located in Zone 1 within which market share has increased considerably from 26.9% to 37.3%, a key positive indicator reflecting an improved customer loyalty in this central catchment area. Epsom Town Centre has also experienced a significant increase in shopper loyalty in Zone 2, Zone 4, Zone 5, Zone 6 and Zone 7.

8.42 Remaining residents in Zone 1 are instead choosing Kingston (20.4%), Sainsbury's Kiln Lane (8.5%), New Malden retail warehousing (7.4%), and Purley Way retail warehousing (4.9%) for their comparison goods shopping.

8.43 Within the whole survey area, Epsom Town Centre draws 10.5% of total available comparison goods expenditure (£216.9m). On the basis of current market shares, we estimate the town centre has a comparison goods sales density of approximately £8,077 per sq m net, which is substantially stronger

than that recorded in 2009 (£3,948 per sq m net). This is a key indicator reflecting the consolidation of Epsom Town Centre and the strong improvement in performance over the last 11 years. The evidence is demonstrating that more people in the core catchment are choosing Epsom over competing centres such as Kingston, Sutton, Guildford and Croydon, for example.

8.44 The 2015 Retail Study Update identified a number of good quality retailers that had opened in Epsom Town Centre since the previous 2009 Retail Study:

- Cabello (A3)
- Guitar Guitar
- Stormfront (Apple/Computers)
- Bills Restaurant
- Hotter Shoes
- Pandora Jewellers
- Sports Direct
- Metro Bank
- Jones Bootmakers
- Pure Gym
- Costa Coffee, Ashley Centre
- Costa Coffee, Odeon
- Costa Coffee, Epsom Station
- Muffin Break (A3)
- La Piccola (A3)
- Roosters Piri Piri (A3)
- Mountain Warehouse
- Nandos
- Smiggle Stationery
- Black Burgers

8.45 This improved representation assisted in the improved overall performance of Epsom Town Centre as a destination of choice since 2008/2009. Representation has improved again more recently with the introduction of White Stuff, Hotel Chocolat, Trespass Clothes, Prezzo…anymore? [add details]

Comparison Goods: Stoneleigh Broadway and Ewell Village Floorspace Performance

8.46 It is evident from the survey results and our qualitative analysis that both Stoneleigh Broadway and Ewell Village have a more limited comparison-goods shopping function which is consistent with their role as district centres and their position in the retail hierarchy beneath Epsom. Nevertheless, the analysis identifies that the comparison goods floorspace that is present is performing well.

8.47 Market share for both centres is limited, with Stoneleigh Broadway achieving a comparison goods market share in Zone 1 (0.22%) and Zone 2 (2.13); and Ewell Village achieving market share in Zone 1 (0.86%), Zone 2 (1.4%), Zone 3 (0.03%) and Zone 7 (0.32%). Within the whole survey area both centres draw 0.3% of total available comparison goods expenditure.

8.48 On the basis of current market shares and a turnover of £6m, we estimate that Stoneleigh Broadway district centre has a comparison goods sales density of approximately £3,480 per sq m net. This is a good performance for a centre of Stoneleigh Broadway's scale and retail offer. Ewell Village has a turnover of £6.2m and a similar sales density of £3,958 per sq m net – again a good performance for a centre of this scale.

Comparison Goods Need

8.49 In assessing capacity for future comparison goods floorspace, we have assumed that the efficiency with which existing floorspace is being used will increase over time, and applied annual growth in existing sales per sq m net of 2.1% (2019-2020), 2.5% (2020-2021), 2.8% (2021-2025) and 2.3%+ beyond 2025. For Epsom Town Centre we have assumed that new floorspace should achieve at least £8,000 per sq m net, retaining strong performance levels in the wider context of planned housing delivery. We forecast that sales density of new floorspace will grow consistent with that set out for existing floorspace.

8.50 This assessment has assumed that Epsom, Stoneleigh Broadway and Ewell will maintain existing market share and we have forecast the need for new comparison goods floorspace to the years 2022, 2027 and 2032. By virtue of growth in population and expenditure – and when taking into account the comparison goods element of the Lidl commitment on Upper High Street – we have projected residual expenditure

to support new floorspace in Epsom Town Centre of £6.2m by 2022, £24.8m by 2027 and £54.8m by 2032.

8.51 This translates into surplus capacity to accommodate an additional 800 sq m net by 2022, 2,900 sq m net by 2027 and 5,700 sq m net by 2032. Given uncertainties in the economy and growing margins of error over time, we do not recommend identifying sites to meet the need beyond 2027, and the new Local Plan should 'plan' to accommodate around 2,900 sq m net of comparison goods floorspace.

9. Conclusions & Recommendations

9.1 Drawing on previous sections, including our qualitative and quantitative analysis, this section sets out the key conclusions arising from our analysis , considers the scope to accommodate new retail and leisure development in the borough, and identifies the opportunity for a pro-active development plan policy framework to facilitate sustained long-term strength in performance.

9.2 The NPPF advises Councils to plan positively to meet needs arising for town centre uses. Policies should support the vitality and viability of town centres, consider frontages and boundaries, and allocate a range of suitable sites to meet the scale and type of retail development needed. This section addresses these requirements and makes recommendations to provide the Council with up to date evidence to prepare suitable strategies for their network of town centres.

Conclusions

Policy

9.3 The NPPF advocates a 'town centres first' approach and requires planning policies to positively promote competitive town centre environments and manage the growth of centres over the plan period. The NPPF encourages LPA's to recognise that town centres are the heart of their communities and to pursue policies which protect their health and vitality and positively seek opportunities to meet the development needs of their area. The development plan should set out policies in respect of Primary Shopping Areas, and Primary and Secondary Shopping Frontages where required.

9.4 The Development Plan confirms the Council's commitment to a positive and pro-active approach to town centre development and change, seeking to improve retail attractions, and increase the range and types of shop and other high street facilities and services. Plan E emphasised that Epsom Town Centre does not require significant change or regeneration, but rather a focus on effectively managing what already exists and making the most of opportunity sites. The document set an A1 minimum threshold of 66% of units within the Primary Shopping Frontage, and 50% within the Town Centre Boundary.

9.5 Key development opportunity sites were identified in Plan E including Depot Road/Upper High Street, The Utilities site, and Epsom Station, one of which has now been implemented (Epsom Station) and one part implemented (Utilities site). When considering development proposals, the development plan does not fix a locally set retail impact floorspace threshold and, by default, refers decision makers to the national NPPF threshold of 2,500 sq m gross.

National Market Context

9.6 Today, the success of town centres is less reliant on traditional retail floorspace, instead becoming more focused on ensuring a multi-dimensional offer and the creation of a visitor experience of sufficient quality to compete with internet sales.

9.7 The town centre market has been challenging in recent years, as the UK comes to terms with and explores the means with which to leave the European Union. Associated economic uncertainty has led to a more reserved level of consumer spending, and this, alongside the growth in online spending, competition for click and collect, and a saturated casual dining experience, the high street has been hit hard.

9.8 For Epsom, the retention of retail floorspace and the consolidation of a diverse leisure and visitor economy will be key to strengthen its position in the sub-regional network of centres performing the role of a larger town centre.

Planning Reform

9.9 Recent consultation on proposed planning reform (2018) highlights the government's intention to move towards a more flexible policy approach to the high street, recognising modern business formats and emerging retail models within A1 shop units. The government response paper suggests, however, that

they are unlikely to move towards a merged Use Class A category in order to retain a level of planning control to pro-actively shape high streets. It should be emphasised that whilst town centre markets are changing the long-term implications are yet to be fully realised.

9.10 The Government's suggested planning reform and 'call for ideas' has been consulted on, but no firm changes have been finalised or implemented. It is premature to recommend a far-reaching overhaul of town centre policy in Epsom & Ewell, but continued monitoring and future evidence base studies should keep this under review. The need for a sound policy framework, strong frontage policies, and a clear and robust statement of permitted uses in different locations will be required over the Local Plan period.

9.11 The market trend and visitor expectations for multi-dimensional town centres must be a consideration, but it should not over-ride the importance and retention of Use Class A1 across Epsom Town Centre which should remain a priority. It is this foundation that will enable the town centre to retain and grow its market share and level of attractiveness within the sub-regional hierarchy of town centres moving forwards.

Sub-Regional Context

9.12 Kingston and Sutton continue to draw greater levels of comparison goods trade from the Zone 1-12 Survey Area when compared to Epsom Town Centre, reflecting their scale and higher order shopping roles. The evidence demonstrates, however, that Epsom is the only town centre that has grown its market share over the last 11 years at the expense of all other shopping destinations. Epsom has consolidated its position and clawed back lost trade – a particularly strong performance and vitality indicator.

9.13 Moving forwards, Kingston, Croydon, Guildford and Sutton all had major retail/town centre expansion plans. In light of economic circumstances and the declining health of the retail sector in recent years, Croydon and Guildford have halted schemes for review with an emphasis on residential led schemes and a substantial scaling back of retail. Kingston continue to move forwards with the redevelopment of the Eden Shopping Centre, although the final mix of Use Class A is unknown but likely to reflect a 'scaled-down' A1 floorspace element. Sutton have identified town centre development sites, but none are likely to incorporate a substantial level of floorspace.

9.14 There is a clear opportunity for Epsom to retain – if not improve – market share still further over the next 10-15 years through a continued pro-active strategy of investment, partnership working and a robust policy framework. This is discussed further in the final section of this report.

Epsom Town Centre: Qualitative Overview

9.15 The evidence presented demonstrates good levels of vitality and viability across the Primary Shopping Area and highlights specific areas for policy intervention to ensure a continued sound performance moving forwards.

9.16 The level of convenience goods provision has remained stable over the last 11 years, and is only marginally below the national average in terms of operator numbers. The range and choice for the local catchment will be enhanced if the permitted Lidl foodstore scheme is implemented just outside the Primary Shopping Area boundary on Upper High Street. The impact of this store on town centre operators and wider town centre performance, should be monitored once open and trading.

9.17 Epsom has a strong mix of mid-range comparison goods retailers, albeit the number of operators in this category has substantially declined over the last 11 years. Despite this trend, Epsom has succeeded in retaining the major key attractors which are critical in underpinning Epsom as a town centre of choice; evidence highlights that the percentage of national multiples within this category has actually increased by 2% in the last 5 years. Policy should aim to halt or reverse the decline of comparison goods operators. It is recommended that town centre partners should target conversations with absent retailers, including higher end clothing operators, in order to understand their locational and unit requirements, and to 'sell' Epsom where possible.

9.18 The evidence demonstrates a good mix of shopping and leisure facilities, supporting an enhanced and multi-dimensional town centre. Cafes and restaurants are distributed throughout the town centre with improved facilities in Epsom Square which has evolved and intentionally established itself as a 'leisure quarter'. The Playhouse Theatre remains a key attractor across the sub-region, the Odeon has invested in a 'Luxe' upgrade, and Picture House has received planning permission for a new six screen cinema in Epsom Square. These uses effectively reinforce the shopping role of Epsom, helping to create a wider visitor destination offering a range of retail and leisure uses for those across the wider sub-regional catchment area.

9.19 Financial and business services is the category most in excess of the national average. Predominantly falling within Use Class A2, it is clear that the Article 4 Direction controlling these uses remains relevant and important in today's market. Audits of both Stoneleigh Broadway and Ewell Village Centres have identified a growth in ground floor Use Class B1 and Use Class D2 across each town centre, and the Development Plan should be pro-active in preventing this trend from emerging within the Epsom Town Centre Primary Shopping Area.

9.20 The Use Class A1 threshold of 66% within the Primary Shopping Frontage has been retained, and this policy was broadly supported and endorsed by the Secretary of State when tested at appeal in 2018. The level is, however, in balance and very close to falling below the threshold in the near future.

9.21 The analysis concludes that each 'vision/character area' remains vital and viable with distinct roles. Recent major investment has improved the cohesiveness and appearance of the western part of the town centre and also Epsom Square, with more projects planned by the BID team. A focus on safety and security will be important, responding to relatively high reported crime rates. The next phase of investment over the plan period should now focus on eastern part of the town centre including High Street (eastern end), the major Church Road junction and Upper High Street.

Epsom Town Centre: Quantitative Performance/Forecasts of Need

9.22 Epsom Town Centre has increased its Zone 1-12 market share from 6.6% in 2009 to 10.5% in 2019, equating to a growth in trade draw from £92.5m in 2009 to £216.9m in 2019. The sub-regional analysis demonstrated that all other centres – including Kingston and Sutton – had experienced a reduced market share over the same period and catchment area. This is a particularly strong vitality indicator for Epsom town centre.

9.23 The improved level of trade retention is reflected in the quantitative analysis of town centre floorspace performance by square metre. Epsom Town Centre is estimated to have a comparison goods sales density of c.£8,077 per sq m net, which is substantially stronger than that recorded in 2009 (£3,948 per sq m net). This adds weight to the need to retain Use Class A1 comparison goods floorspace in Epsom town centre, in order to retain these trade retention and trading levels.

9.24 When forecasting need, the assessment has assumed that Epsom will maintain existing market share, leading to a projected residual expenditure to support new floorspace in Epsom Town Centre of £6.2m by 2022, £24.8m by 2027 and £54.8m by 2032. This translates into surplus capacity to accommodate an additional 800 sq m net by 2022, 2,900 sq m net by 2027 and 5,700 sq m net by 2032.

9.25 Given uncertainties in the economy and growing margins of error over time, we do not recommend identifying sites to meet the need beyond 2027, and the new Local Plan should 'plan' to accommodate around 2,900 sq m net of comparison goods floorspace.

Borough-wide Convenience Goods Need

9.26 The quantitative analysis identifies a level of residual expenditure sufficient to support additional convenience goods floorspace across the borough. Taking into consideration the committed scheme for a new Lidl foodstore on Upper High Street in Epsom, the projections forecast need for 6,920 sq m net by 2022, growing to 7,662 sq m net by 2027, and again to 8,420 sq m net by 2032. It should be noted

that projections beyond 2027 should be treated with caution given growing margins of error over longer time periods, and an ongoing uncertain economy.

9.27 The high levels of convenience goods need is driven predominantly by the out-of-centre Sainsbury's at Kiln Lane, the Aldi foodstore in Kingston Road Local Centre and small format foodstores in Stoneleigh Broadway and Ewell Village – all of which are trading strongly and above expected company averages. Our qualitative analysis of Sainsbury's at Kiln Lane identifies a strong performing store, but not one that is at full capacity. Site visits observed available car parking and short check-out queues. An over-trading store in quantitative terms does not necessarily lead to the need for additional foodstores when qualitative issues are taken into consideration. We conclude that the Sainsbury's store could absorb a proportion of identified need.

9.28 The Aldi store in Kingston Road was, however, observed to be at full capacity in qualitative terms, with regular queuing on the by-pass as cars wait for spaces to become free and longer queues at the payment check-outs. We conclude that this store would be unable to absorb any residual need identified.

9.29 The Borough-wide housing growth strategy will require the consideration of new and sustainable communities, needing to be served by local shopping and service facilities. The residual need identified for convenience goods floorspace should, in the first instance, be directed to these new residential growth areas which would comprise a mix of small to medium-sized foodstores and small unit shops creating parades and new or improved Local Centres.

Epsom Town Centre Strategy

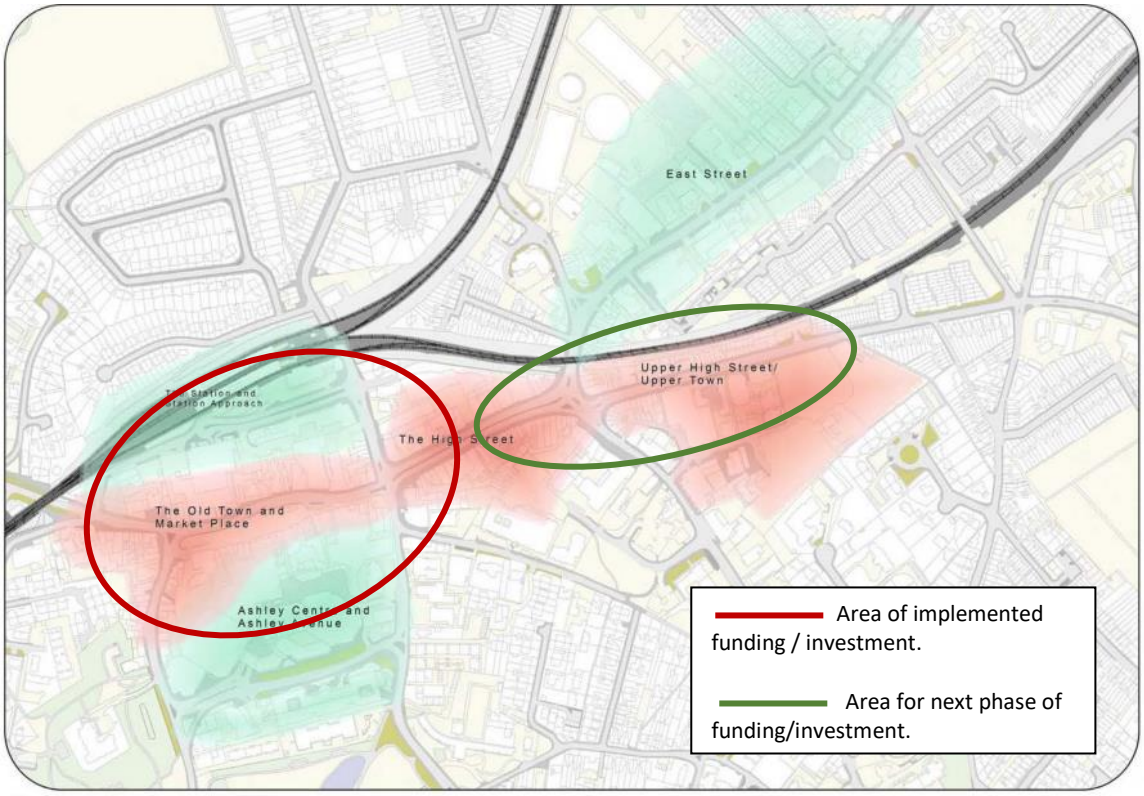
9.30 Over the last 11 years Epsom has consolidated its town centre shopping role in the wider catchment, being the only town centre to grow its market share. It has improved its floorspace performance and substantially increased turnover. The greatest opportunity for Epsom Town Centre is to consolidate its position, market share and catchment area still further over the forthcoming Local Plan period. Kingston and Sutton are both Metropolitan Town Centres at a different (higher) level in the retail hierarchy and it is not possible for a town the size of Epsom to compete. Nevertheless, Epsom has strengthened its role becoming a centre of first choice for a growing proportion of the catchment population; the aim should be to build on this success moving forwards.

9.31 Consistent with conclusions drawn in Plan E, Epsom does not require significant physical growth, change or regeneration, but rather the focus should be on effectively managing what already exists. The conclusions from this piece of work highlight that this strategy has proved successful in recent years, following a strong focus on investment in the public realm, marketing, traffic congestion, environmental appearance and pedestrian movement and circulation. Facebook pages including 'What's on in Epsom', 'Go Epsom' and 'Epsom and Ewell Families' continuously raise the profile of retailers, businesses and events, strengthening the towns appeal and highlighting reasons to visit. The recent 'Nutcracker' trail around the town centre was particularly popular, for example. Combined with a large influx of quality key attractors in the period 2009 to 2015, and a smaller number of multiple and independent operators more recently, the overall impact has been positive. The focus should now be on obtaining the next phase of investment funding, implementing the next phase of town centre enhancements, and supporting complementary BID projects.

9.32 The upkeep and enhancement of Epsom Town Centre should be a continuous pro-active journey over the Local Plan period and beyond, assisting in the centre's attractiveness to visitors, and driving footfall across the entire Primary Shopping Area. In recent years the focus has been on Epsom Station, South Street and the Old Town/Market Place. Moving forwards, the focus should now switch to the High Street, Church Street/East Street junction and Upper High Street as indicated on the plan below. Investment in paving, shop frontages, pedestrian crossings/circulation and street furniture, for example, should take place alongside wide town centre initiatives relating to car parking, events, marketing, crime reduction and business support.

9.33 A pro-active Local Plan policy framework promoting investment and the physical enhancement of the Primary Shopping Frontage in the eastern part of the town centre – as illustrated below – will add weight to frontage policies when making the case against any proposed change of use away from A1.

Epsom Town Centre: Recommended Next Phase of Town Centre Funding/Investment



9.34 The greatest threat to Epsom Town Centre is a fall in the number and quality of A1 comparison goods operators. Whilst the evidence demonstrates the success of Epsom in retaining the larger key attractors, the overall trend has been one of decline, with the Primary Shopping Frontage only just retaining the 66% Use Class A1 threshold. Some individual frontages are substantially below this already.

9.35 Recent government consultations suggest planning reform to introduce more flexibility with the Use Class A category. It should be emphasised, however, that this is only at consultation stage, and the true impact of national market trends and changes to the high street are yet to be fully understood. The starting point of any town centre strategy should be the importance of a critical mass of key attractors and Use Class A1, including fashion and footwear operators. In larger town centres like Epsom, these remain important in driving visitor and footfall numbers in the first instance – particularly when in such close proximity to larger centres such as Kingston and Sutton.

9.36 The 2009 Retail Study drew a similar conclusion, stating that as well as the larger competing town centres, the greatest threat to Epsom is also the decline of its own retail offer and the consequent influx of fast food take-aways and charity shops, for example. Local Plan policy since that time has been largely successful in restricting the introduction of further A5 take-away uses, whilst the Article 4 Direction has prevented permitted change of use of A1 to A2.

9.37 Planning policy should re-emphasise this stance, whilst also highlighting the detrimental impact of Use Class B1 (office) and D2 (leisure) to the vitality and viability of active shopping frontages. Three fitness centres have opened on Upper High Street, effectively removing an active shop frontage. Whilst a mix of uses is encouraged and over-dominance of this type of use will have a negative impact on the health of a high street. The Local Plan policies should include wording to this effect, and highlight the more

appropriate upper floors in order to maximise town centre capacity to accommodate a broad mix of uses whilst supporting active shop frontages at ground floor.

9.38 Whilst preventing any further loss of A1 comparison goods operators, town centre partners should continue to establish connections with a range of higher end retailers with the aim of growing and consolidating this sector. Operators might include, for example, White Company, Cath Kidston, East, Jigsaw, Hobbs, Space NK, Warehouse, Mint Velvet and French Connection – retailers that often favour smaller and more historic shop units like that found in Epsom around the Market Place and on High Street. Any town centre strategy should be informed by the locational and space requirements of such retailers to understand the level of leverage needed to promote and assist in their representation. Town centre partners should target conversations with these operators, promoting this aspiration.

9.39 As set out in Section 2, paragraph 85 of the NPPF aims to ensure the vitality of town centres, advising local authorities to promote the long-term vitality and viability of the network of town centres by allowing them to grow and diversify, allowing a suitable mix of uses (including housing) and promoting their distinctive characters. The NPPF adds that planning policies should define the extent of primary shopping areas, and make clear the range of uses permitted in such locations as part of a positive strategy for the future of each centre. It is also advised/necessary to allocate a range of suitable sites in town centres to meet the scale and type of retail floorspace needed.

9.40 The town centre 'vision' (character) areas identified in Plan E remain relevant in today's context and should form a key part of the town centre strategy for Epsom. Multi-dimensional town centres will be ever more important moving forwards into the future, and a balance of uses should be maintained. The evidence presented in earlier sections conclude a strong and balanced mix of both retail and leisure operators currently represented in Epsom; there is no evident over-dominance of any one category, albeit the proportion of Financial/Business/Property (Use Class A2) is above the national average and any further proliferation should be avoided. With reference to Plan E (2011) we make the following observations:

- Plan E identifies the Old Town/Market Place as the focus for an exciting mix of street-based activities, including pavement cafes, street entertainment and a permanent market. This vision has seen progress recently with investment and enhancement in these key areas, with more to follow as the regeneration phases are completed and the BID projects are rolled out. The momentum should be retained over the Local Plan period.
- The vision for South Street and West Street was high quality independent shops and restaurants. Pavement and road investment have improved the quality of the environment, and this area should greatly benefit from links with the Playhouse Theatre and linked evening economy trips (eating/drinking). Such secondary areas are vulnerable to the infiltration of non-retail uses including B1 office, D2 leisure/fitness gyms and also Use Class A2 financial and business uses. These uses should be prevented in this key stretch of high street, and the Plan E vision should be rolled forward into the new Plan Period.
- The vision for High Street (eastern end) was for it to be reborn as a traditional-style high street shopping environment, reflecting its 1930's history. Plan E made reference to a pleasant and busy retail environment, a mix of retail uses and strong pedestrian link to Upper High Street. The evidence and analysis in this study highlights the continued strength of Use Class A1, but also the vulnerability to its continued decline. Planning policy should continue to protect the 66% Use Class A1 threshold alongside a business plan of environmental, pedestrian and shop front improvements.

  The continued presence of A1 operators alongside a more varied mix is key to ensuring the continued viability of High Street (eastern end) as Primary Shopping Frontage over the development plan period. Plan E recognised that this part of the High Street has experienced decline, but this has not been addressed given the investment focus elsewhere in the town

centre. The policy framework for this vision area should be more specific and detailed in terms of the type of uses permitted, with an additional restriction preventing Use Class A3 in adjoining units. The importance of retaining a 66% threshold should be emphasised with sound and robust reasons provided.

- The intention for Epsom Square was a bustling piazza providing opportunities for people to meet, eat and drink safely throughout the day and into the evening. The square has experienced substantial investment, but there is further opportunity to promote and develop the area into a bustling gathering point. The implementation of the permitted Picture House cinema is a key opportunity to initiate further positive change. Epsom Square should be the focus of the daytime and evening leisure economy in terms of eating and drinking.
- The vision for Upper High Street was an attractive and vibrant part of the town centre offering leisure and shopping activities including high quality and niche retailers, family friendly restaurants and other leisure activities. The historic built environment was recognised for enhancement and protection. Upper High Street does perform a strong local high street with a good mix of uses, which should continue to be encouraged. Like South Street this secondary area will continue to be vulnerable to the infiltration of non-retail uses including B1 office, D2 fitness gyms and also Use Class A2 financial and business uses. These ground floor uses should be strongly resisted in this key stretch of high street, including further fitness centres/gyms (Use Class D2).

9.41 The Primary and Secondary Shopping frontages as defined in the Development Plan remain fit for purpose over the forthcoming Local Plan period. Planning policy should retain the 66% Use Class A1 minimum threshold for the reasons set out above, and strongly resist uses other than A1 and A3. The 66% threshold remains sound and robust, being consistent with national averages for A1 floorspace. The Inspector in the KFC decision did make a number of observations to support her conclusions in support of the proposal, but the over-riding comment was one of consistency with the Primary Shopping Frontage percentage threshold policy. As noted previously, this policy should be reinforced alongside a pro-active investment strategy for the eastern part of the town centre to assist in resisting change of use. Proposals would be considered against the frontage policy but also a robust and detailed town centre strategy for each individual vision area.

9.42 Within Secondary Retail Frontages, Use Classes A1/A2 and A3 should continue to be permitted, but the policy should be extended to strongly resist not only Use Class A5, but also Use Class B1 (office) and Use Class D2 (ground floor leisure fitness studios). The Article 4 Direction removing permitted development from Use Class A1 to Use Class A2 should remain in place over the full Local Plan period. Epsom Square currently falls outside the Primary and Secondary Shopping Frontages, but we recommend policy protects this area for Use Class A3 and A4, pro-actively preventing any change of use to Use Class A2, A5, and B1. In Epsom Square, leisure uses within the D2 category would seem appropriate but should be considered on their own merits and avoid blank/dead street frontages, perhaps being better suited to upper floors.

9.43 The forecast need conclusions do not require any further sites for convenience goods to be identified in the town centre; and the overall strategy for Epsom is not one of growth but of consolidation. In this context, and following a phase of substantial investment in Epsom Town Centre, the following development opportunity sites – first identified in Plan E – remain available:

- Depot Road / Upper High Street: Part of the site fronting Upper High Street has planning permission for a mixed-use residential/foodstore scheme. The Council should consider retaining the remainder of the site as a potential development opportunity, whilst ensuring sufficient supply of car parking to anchor this eastern end of the town centre;

- The Utilities Site: Part implemented for housing, but the remainder of the site should be considered for redevelopment. This would likely encompass residential, but could accommodate retail/leisure uses provided they do not compete with the Primary Shopping Area;
- TK Maxx store, Upper High Street: This is a prominent site located within the heart of the Town Centre's Primary Shopping Area on the western end of the High Street. TK Maxx is a key attractor and key anchor in the town centre, and the upper floor comprises a leisure gym use which should also be retained. Nevertheless, there is opportunity for intensification and additional town centre residential, provided the retention of key retail/leisure operators can be safeguarded. This site also benefits from a pedestrian access route directly through to Epsom train station.

9.44 Finally, it is recommended that the Council review its defined frontages at regular intervals throughout its new Local Plan period. This is because:

- As this study has identified, the role and function of town centres has changed significantly in recent years, as a result of changes on consumers' shopping behaviour and wider market trends. It will be important for the town centre to be responsive to any future changes in behaviour and trends.
- There are three opportunity sites in the town centre, at least one of which we would expect to contain a quantum of retail floorspace if it comes forward for redevelopment. Depending on the nature and amount of floorspace which comes forward, this new development may result in the 'centre of gravity' of the town centre altering, which may in turn require reconsideration of the frontages set out above.

Recommendations: Epsom Town Centre

EP1: Retain the Primary Shopping Area, Primary Shopping Frontage and Secondary Shopping Frontage as existing.

EP2: Policy priority to prevent fall in number of Use Class A1 comparison goods retailers. Retain 66% minimum threshold for Use Class A1 in Primary Shopping Frontages, irrespective of unit size. Clarify the percentage relates to number of units to retain and ensure a strong mix and diversity of retail operator irrespective of floorspace.

EP3: The vacant Maplin unit could be an exception to the Use Class A1 threshold being an anchor gateway site to Epsom Square – the town centre eating/drinking hub. Avoid any A5 element in this unit, promoting instead family sit down dining.

EP4: Only Use Class A1 and Use Class A3 should be allowed within the Primary Shopping Frontage. Amend policy wording.

EP5: Development Plan policy should prevent change of use to Use Class A5, Use Class B1 and Use Class D2 within Secondary Shopping Frontages.

EP6: The Article 4 Direction removing permitted development from Use Class A1 to Use Class A2 should remain in place and be extended to Upper High Street and South Street to avoid any dilution of the vitality and viability of these key frontages.

EP7: Ensure Epsom Square has a robust policy framework identifying appropriate permitted uses and central location as an eating/drinking/entertainment hub – including Use Class A3 and A4. Prevent against ground floor Use Class B1, Use Class A2/A5 and manage Use Class D2 to avoid closed/dead frontages.

EP8: Clearly set out a policy framework and strategy for each of the key vision areas, setting out the uses permitted in each location. Avoid general town centre aspirations to, for example, improve the daytime and night-time economy; and ensure each vision area has a specific framework.

EP9: Encourage town centre living and non-retail uses on vacant or redundant upper floors to encourage footfall and a vibrant daytime, evening and night-economy. This generally also leads to external refurbishment which is much needed in many parts of the town centre.

EP10: Encourage the retention of town centre foodstore operators and monitor the implementation of a new foodstore on Upper High Street if implemented. Assess the impact in terms of performance as a key anchor and footfall driver, or trade diversion from the Primary Shopping Area. Future evidence base to consider any amendment to the Primary Shopping Area boundary as a consequence.

EP11: Reinforce policy to retain Use Class A1 through discussions with absent retailers. Build a network in the category, including those higher end clothing and footwear operators, to understand their unit and locational requirements. Develop a pro-active framework and network to leverage them into the town centre where possible.

EP12: Finalise existing investment projects, and move towards securing the next phase of funding to focus on the eastern part of the town centre, including High Street (eastern end), Church Road/East Street junction and Upper High Street. Focus on general environment, shop frontages, and pedestrian environment and circulation.

EP13: Continue to support the BID and BID projects across Epsom Town Centre. Explore funding partnerships to focus on key issues including entertainment/events, crime prevention and marketing.

EP14: Establish a wider relationship between Epsom Playhouse Theatre and the town centre evening and eating/drinking economy, to promote linked trips and wider economic benefits for the town centre. Discounted car parking to encourage dwell times, distribution of discount restaurant vouchers when booking theatre tickets, or website links to encourage restaurant bookings, for example. A possible BID project.

EP15: Retain Depot Road/Upper High Street, the utilities site and TK Maxx site as potential development opportunity sites suitable for a mix of uses including retail/leisure. Retain TK Maxx and the health club/gym with redevelopment for that site being intensification only. Ensure a sufficient supply of suitable sites to meet the need arising for c.2,900 sq m net of comparison goods floorspace in Epsom town centre, directed to the Primary Shopping Area in the first instance.

EP16: Encourage cycling through a re-evaluation of cycle parking and cycle lanes through the town centre and wider borough.

EP17: Enforce a retail impact threshold within the Development Plan, ensuring that edge and out-of-centre retail development proposals are required to undertake a full and detailed retail impact assessment for schemes at or above 500 sq m gross.

EP18: Continue to monitor the Government's planning reform proposals and outcomes for town centres.

EP19: Continue to monitor competing centre development proposals and aspirations to improve their town centre offer.

Stoneleigh Broadway: Current Performance

9.45 Stoneleigh Broadway is a wide and pedestrian friendly high street, comprising 62 shop units and benefitting from a plentiful supply of free car parking. The range of shop business is strong offering pharmacies, pet shop, two small convenience stores, a good selection of independent convenience stores, Post Office, dry cleaners, hair and beauty, shoe repair, cafes, restaurants, doctors, dentist and taxi office, for example. Community facilities include the library, dance studio and art studio, and the vacancy rate is particularly low.

9.46 The composition and mix of retailing in the Use Class A category (in % terms) has changed very little over the last 8 years, even – in the face of national trends – experiencing a small increase in Use Class A1 and a decrease in Use Class A2. The key change has been the overall decline in the number of businesses in the Use Class A1-A5 categories, with non-A Class businesses now totalling 17 compared to just 5 in 2011.

9.47 Many of these businesses provide active street frontages and generate town centre shopper footfall including the art club, dance studio, doctors, dentist, and library, for example; but the area of concern is the strong rise in Use Class B1 office space at ground floor. These introduce 'dead' frontages and any further growth will dilute retail frontages in what is currently a strong and healthy town centre.

9.48 The quantitative analysis has identified that Stoneleigh has a good comparison goods floorspace performance, trading at c.£3,480 per sq m net. This is concluded to be good for a centre the size of Stoneleigh, which performs the role of a District Centre.

9.49 The performance of convenience goods floorspace is particularly strong, perhaps reflecting local loyalty to the centre, a large 'walk-in' catchment population, free on-street parking and distance from the main out-of-centre foodstore (Sainsbury's Kiln Lane). Both the Co-Op and Sainsbury's stores trade substantially above expected company average levels, a trend often emerging from small format foodstore operators trading from small floorplates.

9.50 In the context of wider recommendations, Stoneleigh District Centre is not required to accommodate substantial additional comparison or convenience goods need. It is not required in policy to grow in scale, but the district centre must aim to consolidate and enhance its performance. Small scale infill sites well linked to the high street frontage might be appropriate for new retail floorspace and each proposal should be considered on its own merits.

Recommendations: Stoneleigh Broadway District Centre

ST1: Retain Primary Shopping Area Boundary, including Station Approach to the west of the railway line/train station.

ST2: Retain Article 4 Direction removing permitted development for change of use from Use Class A1 to Use Class A2, and extend it to cover the entire Primary Shopping Area, but excluding Station Approach to the west of the railway line. Many Use Class A2 Financial & Professional services have the appearance of offices, creating dead high street frontages and detracting from the vitality and mix of uses on the retail high street.

ST3: Policy should prevent any further change of use to Use Class B1 (offices), Use Class D1 (clinics/nurseries/education/training centres) and Use Class D2 (fitness gyms). Like Use Class A2 these uses create dead high street frontages and detract from the vitality and mix of uses on the retail high street.

ST4: Local Plan policies should seek to retain the current level of Use Class A across the town centre. The town centre is performing well, but peripheral areas are becoming characterised by non-retail uses indicating the start of town centre decline if this trend is not stopped.

ST5: Support town centre Community Library where possible.

ST6: Retain free short stay on-street car parking. Encourage environmental improvements and seek allocated funding, particularly targeted around the station area.

Ewell Village: Current Performance

9.51 Ewell Village has 66 retail/leisure business operators offering a good mix of key services and retail categories required for people's day-to-day needs. These include chemists, opticians, pet supplies, dry cleaners, Post Office, taxi office, florist, dentist, two small convenience stores and a newsagent, and a good selection of cafés, restaurants, hairdressers and beauty salons. Unusually for a smaller town

centre, Ewell Village has a selection of clothing and specialist comparison goods operators including a millinery hat designers and dance/ballet/gymnastics clothing and accessories.

9.52 A comparison between the 2011 and 2019 land use surveys has, however, identified a number of changes which should be responded to in the new Local Plan. In particular, the number of retail/leisure businesses has fallen from 70 to 57, with the decline of A1 uses being the primary cause – either through change of use to A2-A5 or to residential, offices, health services and showrooms. Whilst the proportion of Use Class A1 has fallen significantly, the proportion of Use Class A2 and A3 businesses has grown. The increase in beauty salons in the A2 category has been a strong trend, and there are no longer any banks or financial services present; but the number of vacant units and take-aways across the centre is particularly low.

9.53 A key change in the centre has been a noticeable loss of retail/leisure activity around the junction of Cheam Road and High Street. Combined with heavy traffic, this junction area has diluted the 'flow' and connectivity of the centre, inserting a separation within the frontage between north and south. The only key footfall drivers in the north of the centre are the Post Office and Ewell Spring Pharmacy, whilst the southern part of High Street remains the prime retail frontage. Observations of pedestrian footfall indicate that few people visit north and south during the same shopping trip/visit.

9.54 The quantitative analysis has identified that – like Stoneleigh Broadway – Ewell Village has a good comparison goods floorspace performance, trading at c.£3,958 per sq m net. This is a marginally stronger performance than Stoneleigh Broadway and is concluded to be good for a centre the size of Ewell Village, which performs the role of a District Centre.

9.55 Again, like Stoneleigh Broadway, the performance of convenience goods floorspace in Ewell Village is strong, although more in line with company average expectations. Proximity to the large out-of-centre Sainsbury's and more limited on-street parking might partly explain the reason for more conservative trading levels (when compared to Stoneleigh Broadway), but overall existing foodstore provision is considered important to the long term vitality and viability of Ewell Village.

9.56 In the context of wider recommendations, Ewell Village District Centre is not required to accommodate substantial additional comparison or convenience goods need. It is not required in policy to grow in scale, but – like Stoneleigh Broadway – the district centre must aim to consolidate and enhance its performance. Small scale infill sites well linked to the high street frontage might be appropriate for new retail floorspace and each proposal should be considered on its own merits.

Recommendations: Ewell Village District Centre

EW1: Retail Primary Shopping Area Boundary.

EW2: Retain Article 4 Direction removing permitted development for change of use from Use Class A1 to Use Class A2, and extend it to cover a greater length of the High Street towards the junction of Cheam Road and High Street. Many Use Class A2 Financial & Professional services have the appearance of offices, creating dead high street frontages and detracting from the vitality and mix of uses on the retail high street.

EW3: Prevent any further loss of Use Class A1 on the northern High Street which includes the Post Office and Pharmacy. These are two important anchors in this 'separated' frontage and must be protected over the Local Plan period if Ewell Village is to retain a vital and viable Primary Shopping Area. Any further loss will require a re-consideration of the Primary Shopping Frontage in the future.

EW4: Policy should prevent any further change of use to Use Class B1 (offices), Use Class D1 (clinics/nurseries/education/training centres) and Use Class D2 (fitness gyms). Like Use Class A2 these uses create dead high street frontages and detract from the vitality and mix of uses on the retail high street.

EW5: Prevent the introduction of Use Class A5 into the Primary Shopping Area, promoting instead Use Class A1 and Use Class A3. There has been a recent substantial loss of retail uses and the overall policy response should be to halt this declining trend.

EW6: Seek investment for public realm and paving improvements throughout the town centre and particularly at the Cheam Road/High Street junction to encourage pedestrian circulation.

EW7: Retain free short-stay on-street car parking to support the local top up shopping role of the Village Centre.

Appendix 1

National Market Context

Appendix 1: National Market Context

1.1 The 2015 Study identified a number of trends in the retail and leisure sector which have influenced how people use town centres which, in turn, has important implications for the future spatial planning of centres and their long-term vitality and viability. Many of these trends have been well-documented in recent years and can broadly be summarised as follows:

- National/global economic trends;
- Growth in online shopping/multi-channel retailing;
- Changes in property/space requirements of retail and other town centre operators;
- An evolution in the role and function of many town centres away from retail and becoming more multi-dimensional 'destinations', with particular growth in the commercial leisure sector.
- Changes in the convenience goods sector, with a growth in discount retailers and switch towards 'little and often' food shopping.

1.2 The pace of change in the sector has continued unabated since the 2015 Study, with extensive further evidence published that confirms that in order to remain vital and viable locations, town centres will need to continue to evolve and adapt.

1.3 We present an update to each of the key sectoral changes summarised above in the sections below.

The evolving role of the town centre

1.4 Retail continues to remain a vitally important footfall driver in centres, and the main reason that residents are visiting town centres. A retail offer which mixes representation from national multiple retailers which act as 'anchors' and specialist independents which provide diversity is important to attracting footfall, and we expect this to continue over the course of the Council's new Local Plan period.

1.5 However, as the nature of retail continues to change and evolve, the last few years have seen a marked evolution in the role and function of town centres. Town centre visitors are increasingly seeking to combine shopping and leisure activities as an overall 'going out' experience, and therefore successful town centres offer a strong mix of both types of activity. There is a need for town centres to offer an 'experience', not simply be a place to shop. To ensure that town and district town centres have a viable function moving forwards they must provide an attractive shopping and leisure experience which the internet is unable to match.

1.6 Many town centres already have or are successfully moving towards becoming 'experience'-based destinations, with diverse markets strong food & beverage offers, independent / specialist cinemas or street food venues all types of activities where the unique selling points contribute to the overall vitality and viability of a centre. Seasonal events such as Christmas Markets can also act as significant footfall generators.

1.7 Alongside a strong retail and leisure offer will be the need for centres to act as genuine hubs for their communities. Beyond Retail's 'Redefining the Shape and Purpose of Town Centres' (November 2013) concluded that 'town centres need to develop alternative functions to draw people back and support its retail base. Town centres will remain important as a focus for social and commercial purposes however must seek to provide more than a neighbourhood shopping role. Expanding their other roles will be an important response to the polarisation of shopping and in creating a vibrant, social, commercial and cultural hub'.

1.8 By incorporating a wide range of uses - which could also include cultural space, co-working space, workspace for SMEs, community facilities such as libraries, or health and fitness facilities, or education space for example - users can be attracted at different times of the day, and the 'life' of the town centre extends beyond retail trading hours and attracts a broader mix of users. Such an approach can be applied both to new developments, and through appropriate repurposing of existing redundant floorspace in centres.

1.9 Residential uses, including student accommodation, can also play a vital role in supporting the wider vitality and viability of town centres, by delivering additional footfall particularly at evenings and weekends. This naturally lends itself to supporting a centre's evening/night-time economy, but consideration will also need to be given to how a growing residential population can support a town centre's retail community. This could include, for example, ensuring a co-ordinated approach to later trading hours.

1.10 As set out in the previous section, the Council have identified Epsom town centre as a major growth location, and therefore a co-ordinated approach between the Council, retailers and organisations such as the Epsom BID to ensure that the vitality and viability of the town centre can benefit to as great a degree as possible will be important.

Economic trends

1.11 Since the 2015 Study was published, the UK's decision to leave the European Union has become an influencing factor in forecasts of economic growth, with short term uncertainty in particular likely to impact on consumer confidence and spending.

1.12 Our data provider Experian published their most recent 'Retail Planner Briefing Note' in December 2018. This report sets out guidance on forecast expenditure growth rates and forecasts of 'special forms of trading' (e.g. online shopping), which we have incorporated into our updated retail capacity forecasts. Further details of this are provided in Section 7 of this report.

1.13 Experian forecast that the UK economy will remain on a 'sluggish growth trajectory' for the next couple of years, amid ongoing uncertainty over the final outcome of Brexit negotiations. Experian consider that this uncertainty '*is likely to keep businesses and households cautious, and hence* growth in both investment and consumer spending is likely to remain lacklustre. The recent loosening in the Government's fiscal stance is unlikely to offset the drag on the domestic economy'.

1.14 In the medium term, Experian forecast that if a 'soft' Brexit deal is successfully struck (i.e. one which the UK gaining similar access to the single market as it does currently), then a return to a 'long run average of growth' from 2023 onwards, with economic growth remaining constrained during the transition period. Experian advise that once a deal is struck, there is potential for a bounce-back in the economy as uncertainty clears, although this is likely to be dependent on the length of time it takes to conclude an agreement.

1.15 Should a 'soft' Brexit deal not be concluded, and a 'hard'/no deal Brexit prove to be the outcome of negotiations (or an agreement is not concluded within 4 years), this would result in a longer period whereby business plans and consumer spending are undermined by uncertainty, potentially reducing expenditure growth rates over the medium term. The long term economic consequences of Brexit will ultimately be dependent on the terms of the new UK-EU relationship.

Growth in online shopping & multi-channel retailing

1.16 Online shopping has become a firmly established method of shopping, and has delivered both challenges and opportunities for the traditional town centre. The boundaries of physical and online retail are becoming increasingly blurred as a result of mobile and app-based shopping, together with quasi-retail trends such as 'click & collect'. Again, these trends were established at the time of the 2015 Study, but the sector has experienced further growth in the subsequent years.

1.17 Recent data from the ONS confirms the extent to which online platforms now form part of the population's shopping habits. The most recent data available from the ONS on online usage is from 2018, which identified that:

- 90% of households have Internet access, an increase from 83% in 2013 and 65% in 2008.
- 86% of adults use the Internet every day. Daily internet usage has more than doubled since 2008.
- 78% use mobile phones/smartphones to access the Internet. In certain age groups this figure is substantially higher: in the 25-34 year old age group, the figure is 99%; for 16-24 year olds it is 98%; and for 35-44 year olds it is 96%.
- 78% of adults have bought goods or services online in the last 12 months, up 1 percentage point since 2017 and 25 percentage points since 2008.
- 95% of adults in the 16-24 year old age group shop online, and 96% of adults in the 25-34 year old age group shop online. By contrast, only 48% of those over 65 years shop online – however this age group has shown the largest increase in online shopping uptake, increasing from 16% in 2008.

Frequency and nature of online shopping

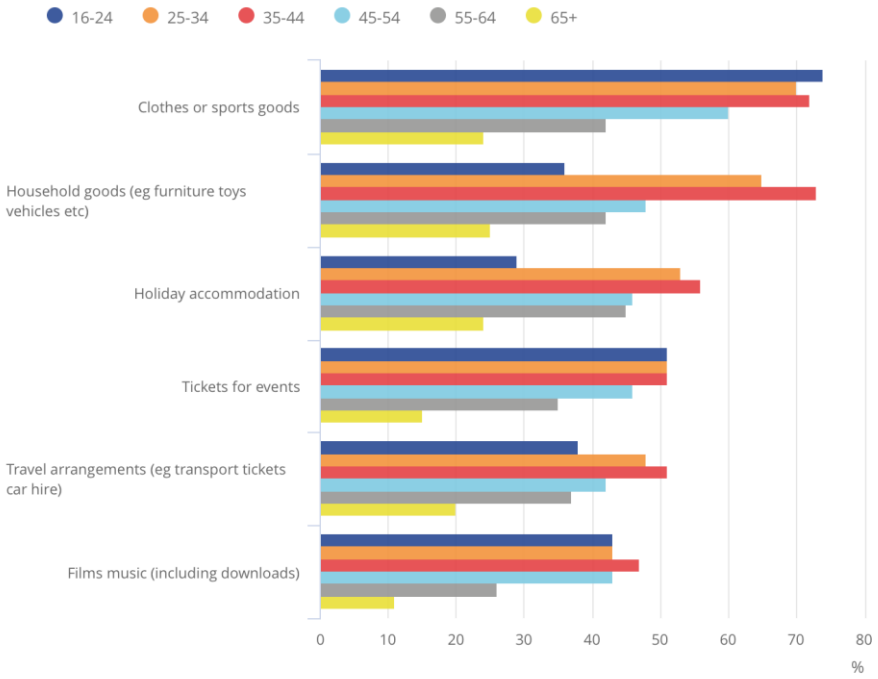
1.18 When looking at the frequency of online shopping and the amount typically spent online, it can be seen that considerable amounts of spend are now being diverted online, which is spend lost from 'bricks and mortar' town centre stores. The ONS[1] identifies that:

- Of those adults who purchased online in the last three months, adults aged 16-24 typically shopped online once or twice; however those in the 25-34, 35-44 and 45-54 age groups most typically shopped online at least ten times over a three month period. In the 35-44 age group, 48% shopped online more than ten times over the three month period.
- Across all age groups, shoppers typically spent between £100 and £499 online in the last three months. In the 35-44 year age group, 30% of adults spent over £1,000 online in the three month period.

1.19 In terms of the range of goods sold, the most popular categories for goods bought online are clothes and sports goods (purchased by 55% of adults within the last twelve months), followed by household goods (e.g furniture, toys); holiday accommodation; tickets for events; travel arrangements (e.g. train tickets, car hire); and films and music (including downloads). **Figure 2.1** shows the frequency of purchase of each of these types of goods by age group.

[1] 2018-based data

Figure 2.1 Online purchases by age group in Great Britain, 2018



Source: Office of National Statistics

1.20 Four out of the six goods categories listed above (clothes/sports goods, household goods, holiday accommodation and films/music) are those which historically been purchased through physical stores, and the shift of spending to online platforms in these sectors has resulted in a number of operators ceasing trading, reducing their network of physical stores, or moving from a mixed physical/online to online only platform.

1.21 Online-only retailers selling fashion goods - such as ASOS, Amazon and Boohoo for example – now account for 38% of the UK online fashion market. These retailers do not have a physical high street presence, and are therefore able to be more responsive to new trends in the sector, and also do not have the overheads associated with 'bricks and mortar' stores, enabling them to be more price-competitive.

Clothing and homewares retailers

1.22 Trends in the clothing and homewares sectors are particularly important to monitor, as in higher-order centres (Epsom town centre, Kingston and Sutton all being examples of these) clothing operators and department stores (for household goods) can act as retail 'anchors' and footfall drivers, and typically trade from amongst the largest units in town centres. The impact of a closure of these stores can therefore potentially have wider implications on the vitality and viability of a centre.

1.23 Both clothing retailers and department store and general merchandise/homewares retailers have been impacted by the above shift towards multi-channel retailing, meaning that, when coupled with often high levels of business rates and rental agreements, the trading viability of stores has often become more marginal. For example, since the 2015 Study:

- the department store House of Fraser has closed a number of stores having entered administration in 2018, and Debenhams confirmed plans in April 2019 to close 22

underperforming stores. House of Fraser has representation in the Borough in the Ashley Centre in Epsom town centre.

- Marks & Spencer confirmed that it would close 100 stores by 2022, many of which would be its traditional 'clothing and home' branches. Other stores have been converted to food-only stores. The M&S branch in Epsom town centre is understood to be unaffected at the present time.
- Arcadia Group (which owns fashion brands including Topshop, Topman, Burton and Dorothy Perkins) recently announced plans to close branches, predominantly when leases in their premises expire.
- 2018 saw a number of other long-standing retailers entering administration, in many cases resulting in extensive store closures. These included Poundworld, Maplin, Toys R Us and HMV, although the latter was subsequently acquired from administration and the majority of stores remained trading.
- Administrations to date in 2019 include value clothing retailer Select, upmarket clothing retailer LK Bennett, and café chain Patisserie Valerie.

1.24 However, other fashion and household/general merchandise retailers continue to perform well, particularly those at the middle to value end of the market. Retailers such as Primark and H&M continue to expand their store portfolio, with the latter recently launching standalone 'H&M Home' stores in a number of locations including central London, Westfield London and Birmingham. Primark have recently opened their largest store to date in Birmingham city centre. Other retailers such as Next, TK Maxx, B&M, Sports Direct (and other brands owned by the same parent company such as Flannels and USC) and Wilko also continue to actively expand their store portfolio and invest in town centre locations.

1.25 Importantly for town centres, Mintel's 'Online Fashion UK 2017' report found that only 15% of online shoppers buy all of their fashion items online - with the remaining 85% using both online and physical stores. Mintel state that this highlights the importance of having a 'joined up' shopping experience. Many retailers are embracing this - as well as 'click and collect' (discussed below), many retailers now offer the ability to check stock levels in a particular store on their website, thus avoiding a wasted trip if a customer wants to buy a specific item, and/or offer in-store kiosks or tablets which enable a wider range of products and sizes to be browsed and ordered by a customer.

Click & Collect

1.26 The click & collect sector continues to benefit from increasing levels of take-up, and research from GlobalData indicates the click & collect market will grow by a further 46% by 2023. Click & collect allows a shopper to order and pay for a product online, and then have it delivered to the nearest physical retail store of the operator. The popularity of click & collect is clearly an important opportunity for town centres, as it can act as a footfall generator in its own right. GlobalData research identify that 39% of consumers make an additional purchase when collecting an item from a store.

1.27 Since the 2017 Study the Click & Collect has continued to advance, as efficient delivery options become an expected norm for consumers. Delivery windows are shortening, with retailers such as Next now offering one hour delivery in certain areas.

1.28 Most major retailers have also partnered with courier companies such as DPD and Collect+ to offer click & collect facilities at an ever-growing network of other collection points such as local newsagents, post offices or Amazon lockers. The latter development can also help to support local centres/neighbourhood shopping parades where these facilities are present.

1.29 A threat to the continued growth of click & collect is the rise of instant delivery and saver delivery. An increasing number of both food and non-food retailers are offering same-day delivery on certain products, including Sainsbury's, Argos, River Island and Maplin. Retailers are increasingly partnering with companies such as Shutl - which allows customers to receive packages locally in as little as 90 minutes, or alternatively choose their own convenient one-hour delivery window - to fulfill same day orders.

1.30 The introduction of delivery passes - whereby a consumer pays a certain amount per year for premium delivery options including next day or guaranteed timeslot delivery of their online shopping order, also appears to be growing in popularity with retailers such as ASOS, New Look and Boohoo now offering this service. The market leader in this type of shopping option remains Amazon Prime, which offers subscribers paying a monthly fee one-day delivery on orders from the Amazon website, alongside access to other subscriber-only services including movie, TV and music streaming. This emerging trend will need to be monitored in terms of its popularity versus click & collect, particularly as it does not deliver the same 'spin off' benefits for town centres in terms of linked spending.

The Commercial Leisure Sector

1.31 Commercial leisure is playing an increasingly important role in the vitality and viability of town centres, as the nature of retail and high street shopping continues to evolve. In many new town centre schemes which have opened in recent years, leisure has replaced retail as the 'anchor' tenant to a scheme.

1.32 'Family dining' restaurants increased in popularity considerably in the years following the last recession, reflecting a wider trend for a higher proportion of consumer expenditure to be spent on socialising and leisure activities rather than shopping. These restaurants have also benefited from many new town centre development schemes having an increasing leisure-orientated focus, enabling them to play a complementary role to a nearby new cinema, for example, as part of the creation of an attractive leisure destination.

1.33 Long-time mainstays of the family dining sector such as Pizza Express, Nando's, Café Rouge and Zizzi expanded and generally continue to perform well. These were joined by a new wave of operators such as Byron, GBK, Franco Manca, Pho and Bill's, who have significantly expanded store numbers in recent years, often with the backing of private equity firms.

1.34 There are signs, however, that this sector of the market may be approaching saturation, and the increased competition in the sector is leading to causalities. Jamie's Italian has recently announced plans to close the majority of its branches; Byron is undergoing restructuring and has closed 20 outlets, and Strada has closed one third of its branches. Analysts suggest in addition to market saturation, the rise in food costs, staff costs, rents and business rates have all impacted on operators' profits, whilst the Brexit decision has, as we have set out above, negatively impacted on consumer confidence and therefore spending.

1.35 The cinema market continues to perform strongly, benefiting from consumers choosing to spend more of their disposable income on leisure activities. A planning application has been submitted for a new Picturehouse cinema in Epsom town centre, with the application currently undetermined.

The Convenience Sector

1.36 The scale of change which has taken place in the convenience sector in recent years has been described by data providers Mintel as 'the trends of the whole of the post-war era [being] reversed'. The changes in the sector can be summarised as follows:

- Superstores are seeing a reduction in market share;

- Convenience (small-format) stores of the market leaders (e.g. Sainsbury's Local, Tesco Express) and Co-Op are gaining market share;
- 'Discount retailers', principally Aldi and Lidl, are achieving strong levels of growth and rapidly expanding their store portfolios;
- Certain retailers which are classified as non-food retailers (for example Marks & Spencer, Home Bargains and Poundland) are increasing their share of food spending;
- Online demand is continuing to grow (although not to the same extent as non-food shopping).

1.37 As with other trends discussed above, these trends were established to varying degrees at the time of the 2015 Study, and have subsequently continued:

- Marks & Spencer are predominantly focussing future growth on expanding their food sales, and in 2019 announced plans to open a number of larger-format foodhalls.
- Aldi and Lidl continue to grow their store numbers and attract an increasing share of the grocery market – Aldi's market share has increased from 3.0% in 2013 to 7.8% in 2018, and Lidl's has increased from 2.8% to 5.5% over the same period. Both operators are actively expanding in London, and Aldi have opened smaller-format 'metro' stores on high street locations in Kilburn, Tooting and Balham. In late 2018, Tesco opened its own discount-format retailer, Jack's, in a number of converted Tesco stores.
- Convenience (small-format) stores continue to open, although not at the pace seen in recent years as availability of sites becomes exhausted. However Co-Op in particular are actively expanding their store portfolio as well as refurbishing existing stores.
- New larger-format supermarket developments are rare (except discount retailers), with the major operators instead focused on making their existing store networks trade more efficiently.

Banks & Financial Services

1.38 The services of the high street banks have traditionally been delivered through their branch networks, meaning that in centres at all levels in the hierarchy, the presence of a wide range of banks and building societies formed an important part of a centre's mix of uses. The numbers of bank branches in the UK have been in decline for the past thirty years, due to a variety of reasons including the desire by banks to cut costs; mergers within the industry; competitive pressures from new entrants in the banking sector; changes in the nature of retail banking transactions; and a growth in alternative means of accessing bank services, particularly driven by technological advances such as online and mobile banking.

1.39 The total number of branches operated by the 'big six' UK banks (Barclays, HBOS, HSBC, Lloyds, Natwest and Santander) declined from 11,240 in 1997 to 7,022 in 20142, although in some locations this decline has been partially offset by the emergence of 'challenger' banks such as Metro Bank, Virgin Money and TSB, with the former of these in particular rapidly expanding its High Street presence. The pace of closures has gathered pace in recent years however; for example in 2017, RBS announced plans to close one quarter of its branch network.

[2] Parliament Research Briefing on bank closures, 2018 research briefings.files.parliament.uk/documents/SN00385/SN00385.pdf

1.40 According to research from CACI, customer visits to retail bank branches are forecast to drop by 36% between 2017 and 2022, with mobile transactions rising 121% in the same period. CACI estimate that the typical person will visit a retail bank branch just four times a year, down from seven in 2017.

1.41 Most banks have an alliance with the Post Office (whose own branch network has remained relatively stable in recent years), meaning that in most smaller centres there are still banking facilities available to those who are not able to use alternative means. However, the decline of bank branches has also served to free up large, often historic and listed commercial premises in primary shopping areas, which are in some instances challenging to let.

1.42 It would appear that, for the time being at least, banks and building societies are generally keen to retain a visible presence in larger/higher-order town centres, but smaller branches in lower-order centres with a more limited customer base appear more vulnerable.

Out-of-centre retailing

1.43 Out-of-centre retailing offers the benefits of lower rents, larger retail units and in most cases, free car parking. According to Verdict, out-of-town retailing is the only form of retailing which has seen store numbers increase consistently since 2000. The Department for Business, Innovation and Skills reports that the number of out-of-centre stores has increased by up to c.1,800 (25%) since 2000.

1.44 The recovery of market confidence which took place since 2013 benefited out-of-town retailing. Vacancy rates fell, footfall has increased, and many retailers are seeking expansion in out-of-centre locations. Some traditional town centre retailers which have developed out-of-town store formats, including John Lewis, which now operates a number of 'At Home' stores in prominent out-of-centre locations, as well as other traditionally 'high street'-focussed retailers such as Debenhams, Next, Primark and H&M.

Epsom & Ewell Borough has relatively limited retail warehouse provision, with the exception of a two retail warehouse units – currently occupied by Wickes and Halfords – on Kiln Lane in Epsom, adjacent to the large out-of-centre Sainsbury's supermarket. However, there are large concentrations of retail warehousing at Purley Way, Croydon (which includes one of London's three IKEA stores, as well as a John Lewis at Home and several home/furniture stores) and at Shannon Corner, New Malden, both of which are easily accessible to many residents of the Borough (although less so by public transport).

Appendix 2

Convenience Goods Need Forecasts

Table 1 - Survey area population forecasts

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total
2017	*60,784*	*61,958*	*78,034*	*19,056*	*15,653*	*17,212*	*18,189*	*24,738*	*31,570*	*32,419*	*32,893*	*100,776*	***493,282***
2019	62,698	63,779	80,649	19,582	16,081	17,681	18,723	25,329	32,301	33,500	33,854	104,296	**508,473**
2022	65,073	66,003	83,570	20,149	16,611	18,246	19,268	25,798	32,778	34,513	34,616	107,740	**524,365**
2027	68,846	69,322	87,711	21,079	17,453	19,181	20,076	26,588	33,590	36,140	35,785	112,941	**548,712**
2032	72,101	72,253	91,311	21,974	18,235	19,869	20,823	27,335	34,457	37,514	36,831	117,436	**570,139**
Change 2019-32	***9,403***	***8,474***	***10,662***	***2,392***	***2,154***	***2,188***	***2,100***	***2,006***	***2,156***	***4,014***	***2,977***	***13,140***	***61,666***

Source: *Experian Micromarketer (2017-based population forecasts)*

Table 1a - Survey area postcode sectors

Zone	Postal Sectors
Zone 1	KT17 1/3/4 - KT18 5/7 - KT19 7/8/9
Zone 2	KT4 7/8 - KT17 2 - KT19 0 - SM2 7 - SM3 8
Zone 3	SM1 1/2/3/4 - SM2 5/6 - SM3 9
Zone 4	SM7 1/2/3
Zone 5	CR5 3 - KT20 6
Zone 6	KT20 7 - RH2 0/9
Zone 7	KT18 6 - KT20 5 - KT22 8
Zone 8	KT21 1/2 - KT22 0/7
Zone 9	KT11 2/3 - KT22 9 - KT23 3/4
Zone 10	KT9 1/2 - KT10 0
Zone 11	KT7 0 - KT8 0/2 - KT10 8/9
Zone 12	KT3 5/6 - KT5 8/9 - KT6 4/5/6/7 - SM4 4 - SW20 9

Table 2 - Survey area per capita expenditure forecasts, convenience goods (locally-derived SFT)

	Expenditure per capita (£)	SFT (%) (Experian)	SFT (£)	Expenditure per capita less SFT
2019	2,485	11.6%	288	2,197
2022	2,530	12.4%	314	2,216
2027	2,543	12.8%	325	2,217
2032	2,555	13.2%	337	2,218

Expenditure growth rates: 0.1% per annum. 2017 prices.
Source: Experian E-Marketer. Expenditure growth rates and allowance for SFT are sourced from Experian Retail Planner 16 (December 2018).

Table 3 - Survey area retail expenditure, convenience goods

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total
	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)
2019	137.73	140.11	177.16	43.02	35.33	38.84	41.13	55.64	70.96	73.59	74.37	229.11	**1,116.98**
2022	144.22	146.28	185.21	44.66	36.81	40.44	42.70	57.18	72.64	76.49	76.72	238.78	**1,162.13**
2027	152.64	153.70	194.47	46.74	38.70	42.53	44.51	58.95	74.48	80.13	79.34	250.41	**1,216.60**
2032	159.93	160.26	202.53	48.74	40.45	44.07	46.19	60.63	76.43	83.21	81.69	260.48	**1,264.61**
Change 2019-32	***22.19***	***20.16***	***25.37***	***5.72***	***5.12***	***5.23***	***5.06***	***4.99***	***5.47***	***9.62***	***7.33***	***31.37***	***147.63***

Source: Tables 1 & 2. 2017 prices.

Table 4 - Convenience goods market share (%) - 2019

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12
Centre/Store	(%)	(%)	(%)	(%)	(%)	(%)	(%)	(%)	(%)	(%)	(%)	(%)
Convenience goods floorspace in Epsom & Ewell (main stores)												
Epsom town centre												
Waitrose, Ashley Centre	6.6%	0.2%	0.2%	1.7%	0.2%	0.7%	1.1%	1.3%	0.2%	0.0%	0.1%	0.0%
Marks & Spencer, Ashley Centre	2.3%	0.0%	0.0%	0.0%	0.4%	0.9%	2.3%	0.6%	0.2%	0.8%	0.3%	0.2%
Tesco Express, Epsom Station	0.6%	0.4%	1.9%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Co-Op, Upper High Street	0.4%	1.1%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Co-Op, Station Approach	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%
Sub-total, Epsom town centre stores	*10.3%*	*1.6%*	*2.1%*	*1.7%*	*1.9%*	*1.7%*	*3.4%*	*1.9%*	*0.4%*	*0.8%*	*0.4%*	*0.6%*
Ewell district centre												
Sainsbury's Local, Cheam Road	0.9%	1.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
Co-Op, High Street	1.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total, Ewell district centre stores	*1.8%*	*1.5%*	*0.0%*	*0.5%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.2%*
Stoneleigh district centre												
Sainsbury's Local, Broadway	0.0%	6.2%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%
Co-Op, Broadway	0.0%	4.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total, Stoneleigh district centre stores	*0.0%*	*10.1%*	*0.0%*	*0.8%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.3%*
Kingston Road local centre												
Aldi, Kingston Road	6.8%	7.8%	0.5%	1.6%	0.0%	0.1%	2.4%	0.4%	0.0%	1.4%	0.7%	5.7%
Co-op, Kingston Road	0.7%	1.3%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%
Sub-total, Kingston Road local centre stores	*7.5%*	*9.0%*	*0.5%*	*1.9%*	*0.0%*	*0.1%*	*2.4%*	*0.4%*	*0.0%*	*1.4%*	*1.1%*	*5.7%*
Chessington Road (Green Lanes) local centre												
Co-Op, Chessington Road	2.6%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.4%
Ruxley Lane (Gatley Avenue) local centre												
Tesco Express, Ruxley Lane	1.8%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%
Other stores (not within a defined centre)												
Sainsbury's, Kiln Lane, Epsom	35.3%	10.6%	0.0%	10.4%	2.6%	1.7%	5.9%	4.1%	0.4%	6.3%	1.7%	0.3%
Co-Op, Ruxley Lane, West Ewell	3.2%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tesco Express, Esso PFS, Reigate Road, Epsom	1.9%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%
Tesco Express, Horton Retail Centre, Epsom	2.4%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
Sub-total, other stores in Epsom & Ewell (excluding local shops)	*42.8%*	*12.0%*	*0.2%*	*10.4%*	*2.6%*	*1.7%*	*5.9%*	*4.1%*	*0.4%*	*6.4%*	*1.7%*	*0.5%*
Total for Epsom & Ewell Borough (A)	**66.9%**	**35.1%**	**2.8%**	**15.2%**	**4.5%**	**3.5%**	**11.7%**	**6.3%**	**0.8%**	**9.5%**	**3.2%**	**7.8%**

Table 4 - Convenience goods market share (%) - 2019 - continued

Zone Centre/Store	Zone 1 (%)	Zone 2 (%)	Zone 3 (%)	Zone 4 (%)	Zone 5 (%)	Zone 6 (%)	Zone 7 (%)	Zone 8 (%)	Zone 9 (%)	Zone 10 (%)	Zone 11 (%)	Zone 12 (%)
Convenience goods floorspace outside Epsom & Ewell Borough												
Other main stores in survey area												
Waitrose, Worcester Park (zone 2)	0.4%	6.8%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%
Sainsbury's Local, Worcester Park (zone 2)	0.0%	4.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%
Asda, St Nicholas Way, Sutton (zone 3)	0.4%	1.8%	7.3%	0.1%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%
Morrisons, High Street, Sutton (zone 3)	0.0%	0.9%	10.6%	1.3%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sainsbury's, High Street, Sutton (zone 3)	0.1%	1.5%	15.4%	1.6%	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sainsbury's, London Road, North Cheam (zone 3)	1.1%	21.5%	11.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.3%
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.5%	4.5%	15.0%	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.6%
Waitrose, Banstead (zone 4)	2.7%	2.3%	1.0%	28.3%	13.2%	4.3%	6.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asda, Burgh Heath (zone 7)	7.8%	0.0%	1.8%	30.3%	24.3%	6.0%	35.2%	1.3%	1.3%	2.1%	0.5%	0.0%
Sainsbury's, Swan Centre, Leatherhead (zone 7)	0.0%	0.0%	0.0%	0.0%	0.5%	0.3%	11.6%	11.5%	13.7%	0.4%	0.0%	0.0%
Lidl, North Street, Leatherhead (zone 8)	1.9%	0.0%	0.0%	0.0%	0.0%	0.4%	0.9%	10.9%	8.9%	0.0%	0.0%	0.0%
Tesco, Oxshott Road, Leatherhead (zone 8)	1.3%	0.0%	0.0%	0.0%	0.0%	1.1%	6.6%	34.8%	18.5%	5.6%	0.6%	0.0%
M&S Foodhall, Ashtead (zone 8)	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	9.2%	0.6%	0.0%	0.0%	0.0%
Tesco Express, Ashtead (zone 8)	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	11.2%	0.0%	0.0%	0.3%	0.0%
Waitrose, Esher (zone 11)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.6%	12.9%	0.0%
Sainsbury's, Victoria Road, Surbiton (zone 12)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.9%	1.8%	9.9%
Waitrose, Surbiton (zone 12)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.8%	9.6%	7.3%
Other main stores in survey area (outside E&E Borough)	4.5%	12.7%	19.9%	13.1%	13.0%	16.3%	16.9%	5.6%	26.9%	26.7%	20.2%	17.3%
Sub-total, other stores in survey area (B)	*22.2%*	*56.8%*	*82.2%*	*78.2%*	*52.7%*	*28.4%*	*78.0%*	*84.6%*	*70.5%*	*54.2%*	*45.9%*	*41.5%*
Stores outside survey area*												
**stores with a market share >10% from any individual zone*												
Morrisons, Reigate	0.0%	0.2%	0.0%	0.2%	0.9%	39.8%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%
Sainsbury's, Bridge Way, Cobham	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	10.4%	2.3%	8.4%	0.7%
Sainsbury's, London Road, Redhill	0.0%	0.0%	0.0%	0.0%	1.4%	12.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tesco Extra, Beverley Way, New Malden	2.1%	2.5%	0.2%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	9.2%	3.7%	13.9%
Tesco, Hurst Road, West Molesey	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	13.8%	0.3%
Other main stores outside survey area	7.7%	3.8%	12.9%	4.3%	39.5%	13.8%	7.0%	6.0%	13.7%	23.3%	20.8%	34.2%
Sub-total, stores outside survey area (C)	*9.7%*	*6.5%*	*13.0%*	*4.5%*	*41.7%*	*65.9%*	*7.2%*	*6.5%*	*25.1%*	*35.0%*	*46.7%*	*49.1%*
Total for stores outside Borough & survey area (B+C)	**31.9%**	**63.2%**	**95.2%**	**82.7%**	**94.4%**	**94.3%**	**85.2%**	**91.1%**	**95.6%**	**89.1%**	**92.6%**	**90.6%**
Local convenience goods												
Local shops & other, Epsom town centre	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Local shops & other, elsewhere in Epsom & Ewell Borough	1.0%	0.4%	0.1%	0.0%	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%
Local shops, elsewhere in survey area (outside E&E Borough)	0.0%	1.3%	1.9%	2.1%	1.1%	2.2%	2.4%	2.6%	3.6%	1.3%	4.1%	1.6%
Total for local shops (D)	**1.2%**	**1.7%**	**2.0%**	**2.1%**	**1.1%**	**2.2%**	**3.1%**	**2.6%**	**3.6%**	**1.3%**	**4.1%**	**1.6%**
Total (A+B+C+D)	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Source: NEMS Household Survey, August 2019

Table 5 - Convenience goods spend (£m) 2019

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total	Total
Centre/Store	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(%)
Total Available Spend - 2019	**137.7**	**140.1**	**177.2**	**43.0**	**35.3**	**38.8**	**41.1**	**55.6**	**71.0**	**73.6**	**74.4**	**229.1**	**1,117.0**	**100.0**
Convenience goods floorspace in Epsom & Ewell (main stores)														
Epsom town centre														
Waitrose, Ashley Centre	9.1	0.2	0.4	0.7	0.1	0.3	0.5	0.7	0.1	0.0	0.1	0.0	**12.2**	**1.1%**
Marks & Spencer, Ashley Centre	3.2	0.0	0.0	0.0	0.1	0.4	0.9	0.3	0.2	0.6	0.2	0.5	**6.4**	**0.6%**
Tesco Express, Epsom Station	0.8	0.5	3.4	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**4.8**	**0.4%**
Co-Op, Upper High Street	0.6	1.5	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**2.4**	**0.2%**
Co-Op, Station Approach	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	**1.6**	**0.1%**
Sub-total, Epsom town centre stores	*14.3*	*2.3*	*3.8*	*0.7*	*0.7*	*0.7*	*1.4*	*1.0*	*0.3*	*0.6*	*0.3*	*1.4*	***27.4***	***2.5%***
Ewell district centre														
Sainsbury's Local, Cheam Road	1.2	1.5	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	**3.3**	**0.3%**
Co-Op, High Street	1.3	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**1.9**	**0.2%**
Sub-total, Ewell district centre stores	*2.5*	*2.1*	*0.0*	*0.2*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.5*	***5.3***	***0.5%***
Stoneleigh district centre														
Sainsbury's Local, Broadway	0.0	8.6	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	**9.8**	**0.9%**
Co-Op, Broadway	0.0	5.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.6**	**0.5%**
Sub-total, Stoneleigh district centre stores	*0.0*	*14.2*	*0.0*	*0.3*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.8*	***15.3***	***1.4%***
Kingston Road local centre														
Aldi, Kingston Road	9.3	10.9	0.9	0.7	0.0	0.0	1.0	0.2	0.0	1.0	0.5	13.1	**37.7**	**3.4%**
Co-op, Kingston Road	1.0	1.8	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	**3.2**	**0.3%**
Sub-total, Kingston Road local centre stores	*10.3*	*12.7*	*0.9*	*0.8*	*0.0*	*0.0*	*1.0*	*0.2*	*0.0*	*1.0*	*0.8*	*13.1*	***40.8***	***3.7%***
Chessington Road (Green Lanes) local centre														
Co-Op, Chessington Road	3.6	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	1.0	**5.6**	**0.5%**
Ruxley Lane (Gatley Avenue) local centre														
Tesco Express, Ruxley Lane	2.4	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	**3.1**	**0.3%**
Other stores (not within a defined centre)														
Sainsbury's, Kiln Lane, Epsom	48.7	14.9	0.0	4.5	0.9	0.7	2.4	2.3	0.3	4.6	1.3	0.8	**81.3**	**7.3%**
Co-Op, Ruxley Lane, West Ewell	4.3	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.0**	**0.4%**
Tesco Express, Esso PFS, Reigate Road, Epsom	2.6	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	**3.0**	**0.3%**
Tesco Express, Horton Retail Centre, Epsom	3.3	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	**5.1**	**0.5%**
Sub-total, other stores in Epsom & Ewell (excluding local shops)	*59.0*	*16.8*	*0.3*	*4.5*	*0.9*	*0.7*	*2.4*	*2.3*	*0.3*	*4.7*	*1.3*	*1.2*	***94.3***	***8.4%***
Total for Epsom & Ewell Borough (A)	**92.2**	**49.1**	**4.9**	**6.5**	**1.6**	**1.4**	**4.8**	**3.5**	**0.6**	**7.0**	**2.4**	**18.0**	**191.9**	**17.2%**

Table 5 - Convenience goods spend (£m) 2019 - continued

Zone Centre/Store	Zone 1 (£m)	Zone 2 (£m)	Zone 3 (£m)	Zone 4 (£m)	Zone 5 (£m)	Zone 6 (£m)	Zone 7 (£m)	Zone 8 (£m)	Zone 9 (£m)	Zone 10 (£m)	Zone 11 (£m)	Zone 12 (£m)	Total (£m)	Total (%)
Total Available Spend - 2019	**137.7**	**140.1**	**177.2**	**43.0**	**35.3**	**38.8**	**41.1**	**55.6**	**71.0**	**73.6**	**74.4**	**229.1**	**1,117.0**	**100.0**
Convenience goods floorspace outside Epsom & Ewell Borough														
Other main stores in survey area														
Waitrose, Worcester Park (zone 2)	0.6	9.5	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.5	**11.8**	**1.1%**
Sainsbury's Local, Worcester Park (zone 2)	0.0	6.9	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	0.0	**7.3**	**0.7%**
Asda, St Nicholas Way, Sutton (zone 3)	0.6	2.5	12.9	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.8	**17.1**	**1.5%**
Morrisons, High Street, Sutton (zone 3)	0.0	1.2	18.8	0.6	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**20.8**	**1.9%**
Sainsbury's, High Street, Sutton (zone 3)	0.2	2.1	27.3	0.7	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**30.5**	**2.7%**
Sainsbury's, London Road, North Cheam (zone 3)	1.5	30.1	19.5	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	9.9	**61.2**	**5.5%**
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.7	6.3	26.5	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.7	**38.6**	**3.5%**
Waitrose, Banstead (zone 4)	3.7	3.2	1.9	12.2	4.7	1.7	2.5	0.0	0.0	0.0	0.0	0.0	**29.8**	**2.7%**
Asda, Burgh Heath (zone 7)	10.7	0.0	3.1	13.0	8.6	2.3	14.5	0.7	0.9	1.5	0.4	0.0	**55.8**	**5.0%**
Sainsbury's, Swan Centre, Leatherhead (zone 7)	0.0	0.0	0.0	0.0	0.2	0.1	4.8	6.4	9.7	0.3	0.0	0.0	**21.5**	**1.9%**
Lidl, North Street, Leatherhead (zone 8)	2.7	0.0	0.0	0.0	0.0	0.2	0.4	6.1	6.3	0.0	0.0	0.0	**15.6**	**1.4%**
Tesco, Oxshott Road, Leatherhead (zone 8)	1.8	0.0	0.0	0.0	0.0	0.4	2.7	19.4	13.1	4.1	0.5	0.0	**42.0**	**3.8%**
M&S Foodhall, Ashtead (zone 8)	1.4	0.0	0.0	0.0	0.0	0.0	0.2	5.1	0.5	0.0	0.0	0.0	**7.2**	**0.6%**
Tesco Express, Ashtead (zone 8)	0.4	0.0	0.0	0.0	0.0	0.0	0.1	6.2	0.0	0.0	0.2	0.0	**6.9**	**0.6%**
Waitrose, Esher (zone 11)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.6	9.6	0.0	**15.2**	**1.4%**
Sainsbury's, Victoria Road, Surbiton (zone 12)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.9	1.3	22.7	**27.0**	**2.4%**
Waitrose, Surbiton (zone 12)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.7	7.2	16.8	**29.7**	**2.7%**
Other main stores in survey area (outside E&E Borough)	6.2	17.7	35.3	5.6	4.6	6.3	6.9	3.1	19.1	19.6	15.0	39.6	**179.2**	**16.0%**
Sub-total, other stores in survey area (B)	*30.5*	*79.5*	*145.6*	*33.7*	*18.6*	*11.0*	*32.1*	*47.1*	*50.1*	*39.9*	*34.1*	*95.1*	***617.2***	***55.3%***
Stores outside survey area*														
**stores with a market share >10% from any individual zone*														
Morrisons, Reigate	0.0	0.2	0.0	0.1	0.3	15.4	0.0	0.0	0.7	0.0	0.0	0.0	**16.7**	**1.5%**
Sainsbury's, Bridge Way, Cobham	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	7.4	1.7	6.3	1.5	**17.2**	**1.5%**
Sainsbury's, London Road, Redhill	0.0	0.0	0.0	0.0	0.5	4.8	0.0	0.0	0.0	0.0	0.0	0.0	**5.3**	**0.5%**
Tesco Extra, Beverley Way, New Malden	2.8	3.5	0.3	0.0	0.0	0.0	0.1	0.0	0.0	6.7	2.7	31.9	**48.0**	**4.3%**
Tesco, Hurst Road, West Molesey	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	10.2	0.8	**11.2**	**1.0%**
Other main stores outside survey area	10.5	5.4	22.8	1.8	13.9	5.4	2.9	3.3	9.7	17.1	15.5	78.3	**186.8**	**16.7%**
Sub-total, stores outside survey area (C)	*13.4*	*9.1*	*23.1*	*1.9*	*14.7*	*25.6*	*3.0*	*3.6*	*17.8*	*25.7*	*34.8*	*112.4*	***285.2***	***25.5%***
Total for stores outside Borough & survey area (B+C)	**43.9**	**88.6**	**168.7**	**35.6**	**33.3**	**36.6**	**35.0**	**50.7**	**67.8**	**65.6**	**68.9**	**207.5**	**902.3**	***80.8%***
Local convenience goods														
Local shops & other, Epsom town centre	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**0.4**	**0.0%**
Local shops & other, elsewhere in Epsom & Ewell Borough	1.3	0.5	0.2	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	**2.3**	**0.2%**
Local shops, elsewhere in survey area (outside E&E Borough)	0.0	1.9	3.4	0.9	0.4	0.8	1.0	1.4	2.6	1.0	3.1	3.7	**20.1**	**1.8%**
Total for local shops (D)	**1.7**	**2.4**	**3.5**	**0.9**	**0.4**	**0.8**	**1.3**	**1.4**	**2.6**	**1.0**	**3.1**	**3.7**	**22.7**	**2.0%**
Total (A+B+C+D)	**137.7**	**140.1**	**177.2**	**43.0**	**35.3**	**38.8**	**41.1**	**55.6**	**71.0**	**73.6**	**74.4**	**229.1**	**1,117.0**	**100.0%**

Source: Table 3, Table 4

Table 6 - Convenience goods spend (£m) 2022

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total	Total
Centre/Store	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(%)
Total Available Spend - 2022	**144.2**	**146.3**	**185.2**	**44.7**	**36.8**	**40.4**	**42.7**	**57.2**	**72.6**	**76.5**	**76.7**	**238.8**	**1,162.1**	**100.0**
Convenience goods floorspace in Epsom & Ewell (main stores)														
Epsom town centre														
Waitrose, Ashley Centre	9.5	0.3	0.4	0.8	0.1	0.3	0.5	0.7	0.1	0.0	0.1	0.0	**12.8**	**1.1%**
Marks & Spencer, Ashley Centre	3.3	0.0	0.0	0.0	0.1	0.4	1.0	0.3	0.2	0.6	0.2	0.5	**6.6**	**0.6%**
Tesco Express, Epsom Station	0.8	0.6	3.5	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.0**	**0.4%**
Co-Op, Upper High Street	0.6	1.6	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**2.5**	**0.2%**
Co-Op, Station Approach	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	**1.6**	**0.1%**
Sub-total, Epsom town centre stores	*14.9*	*2.4*	*3.9*	*0.8*	*0.7*	*0.7*	*1.5*	*1.1*	*0.3*	*0.6*	*0.3*	*1.5*	***28.6***	***2.5%***
Ewell district centre														
Sainsbury's Local, Cheam Road	1.3	1.5	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	**3.5**	**0.3%**
Co-Op, High Street	1.4	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**2.0**	**0.2%**
Sub-total, Ewell district centre stores	*2.7*	*2.2*	*0.0*	*0.2*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.5*	***5.5***	***0.5%***
Stoneleigh district centre														
Sainsbury's Local, Broadway	0.0	9.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	**10.2**	**0.9%**
Co-Op, Broadway	0.0	5.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.8**	**0.5%**
Sub-total, Stoneleigh district centre stores	*0.0*	*14.8*	*0.0*	*0.3*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.8*	***16.0***	***1.4%***
Kingston Road local centre														
Aldi, Kingston Road	9.8	11.4	0.9	0.7	0.0	0.0	1.0	0.2	0.0	1.0	0.6	13.7	**39.3**	**3.4%**
Co-op, Kingston Road	1.0	1.8	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	**3.3**	**0.3%**
Sub-total, Kingston Road local centre stores	*10.8*	*13.2*	*0.9*	*0.8*	*0.0*	*0.0*	*1.0*	*0.2*	*0.0*	*1.0*	*0.8*	*13.7*	***42.6***	***3.7%***
Chessington Road (Green Lanes) local centre														
Co-Op, Chessington Road	3.8	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	1.0	**5.8**	**0.5%**
Ruxley Lane (Gatley Avenue) local centre														
Tesco Express, Ruxley Lane	2.5	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	**3.3**	**0.3%**
Other stores (not within a defined centre)														
Sainsbury's, Kiln Lane, Epsom	51.0	15.5	0.0	4.6	1.0	0.7	2.5	2.3	0.3	4.8	1.3	0.8	**84.9**	**7.3%**
Co-Op, Ruxley Lane, West Ewell	4.6	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.2**	**0.4%**
Tesco Express, Esso PFS, Reigate Road, Epsom	2.8	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	**3.2**	**0.3%**
Tesco Express, Horton Retail Centre, Epsom	3.5	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	**5.3**	**0.5%**
Sub-total, other stores in Epsom & Ewell (excluding local shops)	*61.8*	*17.5*	*0.3*	*4.6*	*1.0*	*0.7*	*2.5*	*2.3*	*0.3*	*4.9*	*1.3*	*1.2*	***98.5***	***8.5%***
Total for Epsom & Ewell Borough (A)	**96.5**	**51.3**	**5.2**	**6.8**	**1.7**	**1.4**	**5.0**	**3.6**	**0.6**	**7.3**	**2.5**	**18.7**	**200.4**	**17.2%**

Table 6 - Convenience goods spend (£m) 2022 - continued

Zone Centre/Store	Zone 1 (£m)	Zone 2 (£m)	Zone 3 (£m)	Zone 4 (£m)	Zone 5 (£m)	Zone 6 (£m)	Zone 7 (£m)	Zone 8 (£m)	Zone 9 (£m)	Zone 10 (£m)	Zone 11 (£m)	Zone 12 (£m)	Total (£m)	Total (%)
Total Available Spend - 2022	**144.2**	**146.3**	**185.2**	**44.7**	**36.8**	**40.4**	**42.7**	**57.2**	**72.6**	**76.5**	**76.7**	**238.8**	**1,162.1**	**100.0**
Convenience goods floorspace outside Epsom & Ewell Borough														
Other main stores in survey area														
Waitrose, Worcester Park (zone 2)	0.6	9.9	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.5	**12.3**	**1.1%**
Sainsbury's Local, Worcester Park (zone 2)	0.0	7.2	0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.0	**7.6**	**0.7%**
Asda, St Nicholas Way, Sutton (zone 3)	0.6	2.6	13.5	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.9	**17.8**	**1.5%**
Morrisons, High Street, Sutton (zone 3)	0.0	1.3	19.6	0.6	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**21.7**	**1.9%**
Sainsbury's, High Street, Sutton (zone 3)	0.2	2.2	28.5	0.7	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**31.8**	**2.7%**
Sainsbury's, London Road, North Cheam (zone 3)	1.6	31.4	20.4	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.3	**64.0**	**5.5%**
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.7	6.6	27.7	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.9	**40.3**	**3.5%**
Waitrose, Banstead (zone 4)	3.9	3.4	1.9	12.6	4.9	1.7	2.6	0.0	0.0	0.0	0.0	0.0	**31.0**	**2.7%**
Asda, Burgh Heath (zone 7)	11.2	0.0	3.2	13.5	8.9	2.4	15.0	0.7	0.9	1.6	0.4	0.0	**58.1**	**5.0%**
Sainsbury's, Swan Centre, Leatherhead (zone 7)	0.0	0.0	0.0	0.0	0.2	0.1	4.9	6.6	10.0	0.3	0.0	0.0	**22.1**	**1.9%**
Lidl, North Street, Leatherhead (zone 8)	2.8	0.0	0.0	0.0	0.0	0.2	0.4	6.2	6.5	0.0	0.0	0.0	**16.1**	**1.4%**
Tesco, Oxshott Road, Leatherhead (zone 8)	1.9	0.0	0.0	0.0	0.0	0.4	2.8	19.9	13.4	4.3	0.5	0.0	**43.3**	**3.7%**
M&S Foodhall, Ashtead (zone 8)	1.5	0.0	0.0	0.0	0.0	0.0	0.2	5.3	0.5	0.0	0.0	0.0	**7.4**	**0.6%**
Tesco Express, Ashtead (zone 8)	0.4	0.0	0.0	0.0	0.0	0.0	0.1	6.4	0.0	0.0	0.2	0.0	**7.1**	**0.6%**
Waitrose, Esher (zone 11)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.8	9.9	0.0	**15.7**	**1.4%**
Sainsbury's, Victoria Road, Surbiton (zone 12)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.0	1.3	23.7	**28.1**	**2.4%**
Waitrose, Surbiton (zone 12)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.9	7.4	17.5	**30.8**	**2.7%**
Other main stores in survey area (outside E&E Borough)	6.5	18.5	36.9	5.8	4.8	6.6	7.2	3.2	19.5	20.4	15.5	41.3	**186.3**	**16.0%**
Sub-total, other stores in survey area (B)	*32.0*	*83.0*	*152.2*	*34.9*	*19.4*	*11.5*	*33.3*	*48.4*	*51.2*	*41.4*	*35.2*	*99.1*	***641.6***	***55.2%***
Stores outside survey area*														
**stores with a market share >10% from any individual zone*														
Morrisons, Reigate	0.0	0.2	0.0	0.1	0.3	16.1	0.0	0.0	0.7	0.0	0.0	0.0	**17.4**	**1.5%**
Sainsbury's, Bridge Way, Cobham	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	7.5	1.8	6.5	1.6	**17.7**	**1.5%**
Sainsbury's, London Road, Redhill	0.0	0.0	0.0	0.0	0.5	5.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.5**	**0.5%**
Tesco Extra, Beverley Way, New Malden	3.0	3.6	0.3	0.0	0.0	0.0	0.1	0.0	0.0	7.0	2.8	33.2	**50.0**	**4.3%**
Tesco, Hurst Road, West Molesey	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	10.6	0.8	**11.5**	**1.0%**
Other main stores outside survey area	11.0	5.6	23.9	1.9	14.5	5.6	3.0	3.4	10.0	17.8	16.0	81.6	**194.3**	**16.7%**
Sub-total, stores outside survey area (C)	*14.0*	*9.5*	*24.2*	*2.0*	*15.4*	*26.7*	*3.1*	*3.7*	*18.2*	*26.7*	*35.9*	*117.2*	***296.5***	***25.5%***
Total for stores outside Borough & survey area (B+C)	**46.0**	**92.5**	**176.4**	**37.0**	**34.7**	**38.1**	**36.4**	**52.1**	**69.5**	**68.2**	**71.1**	**216.2**	**938.1**	***80.7%***
Local convenience goods														
Local shops & other, Epsom town centre	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**0.4**	**0.0%**
Local shops & other, elsewhere in Epsom & Ewell Borough	1.4	0.5	0.2	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	**2.4**	**0.2%**
Local shops, elsewhere in survey area (outside E&E Borough)	0.0	2.0	3.5	0.9	0.4	0.9	1.0	1.5	2.6	1.0	3.2	3.8	**20.8**	**1.8%**
Total for local shops (D)	**1.8**	**2.5**	**3.7**	**0.9**	**0.4**	**0.9**	**1.3**	**1.5**	**2.6**	**1.0**	**3.2**	**3.8**	**23.6**	**2.0%**
Total (A+B+C+D)	**144.2**	**146.3**	**185.2**	**44.7**	**36.8**	**40.4**	**42.7**	**57.2**	**72.6**	**76.5**	**76.7**	**238.8**	**1,162.1**	**100.0%**

Source: Table 3, Table 4

Table 7 - Convenience goods spend (£m) 2027

Zone Centre/Store	Zone 1 (£m)	Zone 2 (£m)	Zone 3 (£m)	Zone 4 (£m)	Zone 5 (£m)	Zone 6 (£m)	Zone 7 (£m)	Zone 8 (£m)	Zone 9 (£m)	Zone 10 (£m)	Zone 11 (£m)	Zone 12 (£m)	Total (£m)	Total (%)
Total Available Spend - 2027	**152.6**	**153.7**	**194.5**	**46.7**	**38.7**	**42.5**	**44.5**	**59.0**	**74.5**	**80.1**	**79.3**	**250.4**	**1,216.6**	**100.0**
Convenience goods floorspace in Epsom & Ewell (main stores)														
Epsom town centre														
Waitrose, Ashley Centre	10.1	0.3	0.5	0.8	0.1	0.3	0.5	0.8	0.1	0.0	0.1	0.0	**13.5**	**1.1%**
Marks & Spencer, Ashley Centre	3.5	0.0	0.0	0.0	0.1	0.4	1.0	0.3	0.2	0.7	0.2	0.5	**7.0**	**0.6%**
Tesco Express, Epsom Station	0.9	0.6	3.7	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.3**	**0.4%**
Co-Op, Upper High Street	0.6	1.7	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**2.7**	**0.2%**
Co-Op, Station Approach	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	**1.7**	**0.1%**
Sub-total, Epsom town centre stores	*15.8*	*2.5*	*4.1*	*0.8*	*0.7*	*0.7*	*1.5*	*1.1*	*0.3*	*0.7*	*0.3*	*1.6*	***30.2***	***2.5%***
Ewell district centre														
Sainsbury's Local, Cheam Road	1.3	1.6	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	**3.7**	**0.3%**
Co-Op, High Street	1.5	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**2.1**	**0.2%**
Sub-total, Ewell district centre stores	*2.8*	*2.3*	*0.0*	*0.2*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.5*	***5.8***	***0.5%***
Stoneleigh district centre														
Sainsbury's Local, Broadway	0.0	9.5	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9	**10.7**	**0.9%**
Co-Op, Broadway	0.0	6.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**6.1**	**0.5%**
Sub-total, Stoneleigh district centre stores	*0.0*	*15.6*	*0.0*	*0.4*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.9*	***16.8***	***1.4%***
Kingston Road local centre														
Aldi, Kingston Road	10.4	11.9	1.0	0.7	0.0	0.0	1.1	0.2	0.0	1.1	0.6	14.3	**41.3**	**3.4%**
Co-op, Kingston Road	1.1	1.9	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	**3.5**	**0.3%**
Sub-total, Kingston Road local centre stores	*11.5*	*13.9*	*1.0*	*0.9*	*0.0*	*0.0*	*1.1*	*0.2*	*0.0*	*1.1*	*0.9*	*14.3*	***44.8***	***3.7%***
Chessington Road (Green Lanes) local centre														
Co-Op, Chessington Road	4.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	1.0	**6.2**	**0.5%**
Ruxley Lane (Gatley Avenue) local centre														
Tesco Express, Ruxley Lane	2.7	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	**3.4**	**0.3%**
Other stores (not within a defined centre)														
Sainsbury's, Kiln Lane, Epsom	53.9	16.3	0.0	4.9	1.0	0.7	2.6	2.4	0.3	5.1	1.4	0.8	**89.5**	**7.4%**
Co-Op, Ruxley Lane, West Ewell	4.8	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.5**	**0.5%**
Tesco Express, Esso PFS, Reigate Road, Epsom	2.9	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	**3.3**	**0.3%**
Tesco Express, Horton Retail Centre, Epsom	3.7	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	**5.6**	**0.5%**
Sub-total, other stores in Epsom & Ewell (excluding local shops)	*65.4*	*18.4*	*0.3*	*4.9*	*1.0*	*0.7*	*2.6*	*2.4*	*0.3*	*5.2*	*1.4*	*1.3*	***103.9***	***8.5%***
Total for Epsom & Ewell Borough (A)	**102.1**	**53.9**	**5.4**	**7.1**	**1.7**	**1.5**	**5.2**	**3.7**	**0.6**	**7.6**	**2.5**	**19.6**	**211.1**	**17.3%**

Table 7 - Convenience goods spend (£m) 2027 - continued

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total	Total
Centre/Store	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(%)
Total Available Spend - 2027	**152.6**	**153.7**	**194.5**	**46.7**	**38.7**	**42.5**	**44.5**	**59.0**	**74.5**	**80.1**	**79.3**	**250.4**	**1,216.6**	**100.0**
Convenience goods floorspace outside Epsom & Ewell Borough														
Other main stores in survey area														
Waitrose, Worcester Park (zone 2)	0.6	10.4	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.6	**12.9**	**1.1%**
Sainsbury's Local, Worcester Park (zone 2)	0.0	7.5	0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.0	**8.0**	**0.7%**
Asda, St Nicholas Way, Sutton (zone 3)	0.7	2.8	14.2	0.1	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.9	**18.7**	**1.5%**
Morrisons, High Street, Sutton (zone 3)	0.0	1.4	20.6	0.6	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**22.8**	**1.9%**
Sainsbury's, High Street, Sutton (zone 3)	0.2	2.3	30.0	0.7	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**33.4**	**2.7%**
Sainsbury's, London Road, North Cheam (zone 3)	1.7	33.0	21.4	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.8	**67.2**	**5.5%**
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.8	6.9	29.1	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.1	**42.3**	**3.5%**
Waitrose, Banstead (zone 4)	4.2	3.5	2.0	13.2	5.1	1.8	2.7	0.0	0.0	0.0	0.0	0.0	**32.5**	**2.7%**
Asda, Burgh Heath (zone 7)	11.9	0.0	3.4	14.2	9.4	2.6	15.7	0.8	1.0	1.7	0.4	0.0	**60.9**	**5.0%**
Sainsbury's, Swan Centre, Leatherhead (zone 7)	0.0	0.0	0.0	0.0	0.2	0.1	5.2	6.8	10.2	0.3	0.0	0.0	**22.8**	**1.9%**
Lidl, North Street, Leatherhead (zone 8)	3.0	0.0	0.0	0.0	0.0	0.2	0.4	6.4	6.6	0.0	0.0	0.0	**16.6**	**1.4%**
Tesco, Oxshott Road, Leatherhead (zone 8)	2.0	0.0	0.0	0.0	0.0	0.5	3.0	20.5	13.8	4.5	0.5	0.0	**44.7**	**3.7%**
M&S Foodhall, Ashtead (zone 8)	1.6	0.0	0.0	0.0	0.0	0.0	0.2	5.4	0.5	0.0	0.0	0.0	**7.7**	**0.6%**
Tesco Express, Ashtead (zone 8)	0.4	0.0	0.0	0.0	0.0	0.0	0.1	6.6	0.0	0.0	0.2	0.0	**7.4**	**0.6%**
Waitrose, Esher (zone 11)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.1	10.2	0.0	**16.4**	**1.3%**
Sainsbury's, Victoria Road, Surbiton (zone 12)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.2	1.4	24.9	**29.4**	**2.4%**
Waitrose, Surbiton (zone 12)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.2	7.6	18.4	**32.2**	**2.6%**
Other main stores in survey area (outside E&E Borough)	6.9	19.5	38.7	6.1	5.0	6.9	7.5	3.3	20.0	21.4	16.0	43.3	**194.8**	**16.0%**
Sub-total, other stores in survey area (B)	*33.8*	*87.2*	*159.8*	*36.6*	*20.4*	*12.1*	*34.7*	*49.9*	*52.5*	*43.4*	*36.4*	*103.9*	***670.7***	***55.1%***
Stores outside survey area*														
**stores with a market share >10% from any individual zone*														
Morrisons, Reigate	0.0	0.2	0.0	0.1	0.3	16.9	0.0	0.0	0.7	0.0	0.0	0.0	**18.3**	**1.5%**
Sainsbury's, Bridge Way, Cobham	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	7.7	1.8	6.7	1.6	**18.2**	**1.5%**
Sainsbury's, London Road, Redhill	0.0	0.0	0.0	0.0	0.5	5.3	0.0	0.0	0.0	0.0	0.0	0.0	**5.8**	**0.5%**
Tesco Extra, Beverley Way, New Malden	3.1	3.8	0.3	0.0	0.0	0.0	0.1	0.0	0.0	7.3	2.9	34.8	**52.4**	**4.3%**
Tesco, Hurst Road, West Molesey	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	10.9	0.8	**12.0**	**1.0%**
Other main stores outside survey area	11.7	5.9	25.1	2.0	15.3	5.9	3.1	3.5	10.2	18.7	16.5	85.6	**203.4**	**16.7%**
Sub-total, stores outside survey area (C)	*14.8*	*10.0*	*25.4*	*2.1*	*16.1*	*28.0*	*3.2*	*3.8*	*18.7*	*28.0*	*37.1*	*122.9*	***310.1***	***25.5%***
Total for stores outside Borough & survey area (B+C)	**48.6**	**97.2**	**185.2**	**38.7**	**36.5**	**40.1**	**37.9**	**53.7**	**71.2**	**71.4**	**73.5**	**226.8**	**980.9**	***80.6%***
Local convenience goods														
Local shops & other, Epsom town centre	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**0.4**	**0.0%**
Local shops & other, elsewhere in Epsom & Ewell Borough	1.5	0.5	0.2	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	**2.5**	**0.2%**
Local shops, elsewhere in survey area (outside E&E Borough)	0.0	2.1	3.7	1.0	0.4	0.9	1.1	1.5	2.7	1.1	3.3	4.0	**21.7**	**1.8%**
Total for local shops (D)	**1.9**	**2.6**	**3.9**	**1.0**	**0.4**	**0.9**	**1.4**	**1.5**	**2.7**	**1.1**	**3.3**	**4.0**	**24.6**	**2.0%**
Total (A+B+C+D)	**152.6**	**153.7**	**194.5**	**46.7**	**38.7**	**42.5**	**44.5**	**59.0**	**74.5**	**80.1**	**79.3**	**250.4**	**1,216.6**	**100.0%**

Source: Table 3, Table 4

Table 8 - Convenience goods spend (£m) 2032

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total	Total
Centre/Store	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(£m)**	**(%)**
Total Available Spend - 2032	**159.9**	**160.3**	**202.5**	**48.7**	**40.4**	**44.1**	**46.2**	**60.6**	**76.4**	**83.2**	**81.7**	**260.5**	**1,264.6**	**100.0**
Convenience goods floorspace in Epsom & Ewell (main stores)														
Epsom town centre														
Waitrose, Ashley Centre	10.6	0.3	0.5	0.8	0.1	0.3	0.5	0.8	0.1	0.0	0.1	0.0	**14.1**	**1.1%**
Marks & Spencer, Ashley Centre	3.7	0.0	0.0	0.0	0.2	0.4	1.0	0.3	0.2	0.7	0.2	0.5	**7.3**	**0.6%**
Tesco Express, Epsom Station	0.9	0.6	3.8	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.5**	**0.4%**
Co-Op, Upper High Street	0.7	1.7	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**2.8**	**0.2%**
Co-Op, Station Approach	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.1	**1.8**	**0.1%**
Sub-total, Epsom town centre stores	*16.5*	*2.6*	*4.3*	*0.8*	*0.8*	*0.7*	*1.6*	*1.1*	*0.3*	*0.7*	*0.3*	*1.6*	***31.5***	***2.5%***
Ewell district centre														
Sainsbury's Local, Cheam Road	1.4	1.7	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	**3.8**	**0.3%**
Co-Op, High Street	1.5	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**2.2**	**0.2%**
Sub-total, Ewell district centre stores	*2.9*	*2.4*	*0.0*	*0.2*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.5*	***6.1***	***0.5%***
Stoneleigh district centre														
Sainsbury's Local, Broadway	0.0	9.9	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9	**11.2**	**0.9%**
Co-Op, Broadway	0.0	6.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**6.4**	**0.5%**
Sub-total, Stoneleigh district centre stores	*0.0*	*16.3*	*0.0*	*0.4*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*0.9*	***17.5***	***1.4%***
Kingston Road local centre														
Aldi, Kingston Road	10.8	12.5	1.0	0.8	0.0	0.0	1.1	0.2	0.0	1.1	0.6	14.9	**43.1**	**3.4%**
Co-op, Kingston Road	1.2	2.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	**3.6**	**0.3%**
Sub-total, Kingston Road local centre stores	*12.0*	*14.5*	*1.0*	*0.9*	*0.0*	*0.0*	*1.1*	*0.2*	*0.0*	*1.1*	*0.9*	*14.9*	***46.7***	***3.7%***
Chessington Road (Green Lanes) local centre														
Co-Op, Chessington Road	4.2	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	1.1	**6.4**	**0.5%**
Ruxley Lane (Gatley Avenue) local centre														
Tesco Express, Ruxley Lane	2.8	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	**3.6**	**0.3%**
Other stores (not within a defined centre)														
Sainsbury's, Kiln Lane, Epsom	56.5	17.0	0.0	5.1	1.0	0.8	2.7	2.5	0.3	5.3	1.4	0.9	**93.5**	**7.4%**
Co-Op, Ruxley Lane, West Ewell	5.1	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**5.8**	**0.5%**
Tesco Express, Esso PFS, Reigate Road, Epsom	3.1	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	**3.5**	**0.3%**
Tesco Express, Horton Retail Centre, Epsom	3.9	1.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	**5.8**	**0.5%**
Sub-total, other stores in Epsom & Ewell (excluding local shops)	*68.5*	*19.2*	*0.3*	*5.1*	*1.0*	*0.8*	*2.7*	*2.5*	*0.3*	*5.4*	*1.4*	*1.3*	***108.6***	***8.6%***
Total for Epsom & Ewell Borough (A)	**107.0**	**56.2**	**5.6**	**7.4**	**1.8**	**1.5**	**5.4**	**3.8**	**0.6**	**7.9**	**2.6**	**20.4**	**220.4**	**17.4%**

Table 8 - Convenience goods spend (£m) 2032 - continued

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total	Total
Centre/Store	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(%)
Total Available Spend - 2032	**159.9**	**160.3**	**202.5**	**48.7**	**40.4**	**44.1**	**46.2**	**60.6**	**76.4**	**83.2**	**81.7**	**260.5**	**1,264.6**	**100.0**
Convenience goods floorspace outside Epsom & Ewell Borough														
Other main stores in survey area														
Waitrose, Worcester Park (zone 2)	0.6	10.8	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.7	**13.5**	**1.1%**
Sainsbury's Local, Worcester Park (zone 2)	0.0	7.9	0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.0	**8.4**	**0.7%**
Asda, St Nicholas Way, Sutton (zone 3)	0.7	2.9	14.8	0.1	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.9	**19.5**	**1.5%**
Morrisons, High Street, Sutton (zone 3)	0.0	1.4	21.4	0.6	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**23.7**	**1.9%**
Sainsbury's, High Street, Sutton (zone 3)	0.2	2.4	31.2	0.8	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**34.8**	**2.8%**
Sainsbury's, London Road, North Cheam (zone 3)	1.8	34.4	22.3	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	11.2	**70.0**	**5.5%**
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.8	7.2	30.3	1.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.2	**44.1**	**3.5%**
Waitrose, Banstead (zone 4)	4.4	3.7	2.1	13.8	5.3	1.9	2.8	0.0	0.0	0.0	0.0	0.0	**33.9**	**2.7%**
Asda, Burgh Heath (zone 7)	12.4	0.0	3.5	14.8	9.8	2.6	16.3	0.8	1.0	1.7	0.4	0.0	**63.4**	**5.0%**
Sainsbury's, Swan Centre, Leatherhead (zone 7)	0.0	0.0	0.0	0.0	0.2	0.1	5.4	7.0	10.5	0.3	0.0	0.0	**23.5**	**1.9%**
Lidl, North Street, Leatherhead (zone 8)	3.1	0.0	0.0	0.0	0.0	0.2	0.4	6.6	6.8	0.0	0.0	0.0	**17.1**	**1.4%**
Tesco, Oxshott Road, Leatherhead (zone 8)	2.1	0.0	0.0	0.0	0.0	0.5	3.1	21.1	14.1	4.7	0.5	0.0	**46.0**	**3.6%**
M&S Foodhall, Ashtead (zone 8)	1.6	0.0	0.0	0.0	0.0	0.0	0.2	5.6	0.5	0.0	0.0	0.0	**7.9**	**0.6%**
Tesco Express, Ashtead (zone 8)	0.5	0.0	0.0	0.0	0.0	0.0	0.1	6.8	0.0	0.0	0.2	0.0	**7.6**	**0.6%**
Waitrose, Esher (zone 11)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.4	10.5	0.0	**16.9**	**1.3%**
Sainsbury's, Victoria Road, Surbiton (zone 12)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.3	1.4	25.9	**30.6**	**2.4%**
Waitrose, Surbiton (zone 12)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.5	7.9	19.1	**33.4**	**2.6%**
Other main stores in survey area (outside E&E Borough)	7.2	20.3	40.4	6.4	5.3	7.2	7.8	3.4	20.5	22.2	16.5	45.0	**202.2**	**16.0%**
Sub-total, other stores in survey area (B)	*35.4*	*91.0*	*166.4*	*38.1*	*21.3*	*12.5*	*36.0*	*51.3*	*53.9*	*45.1*	*37.5*	*108.1*	***696.7***	***55.1%***
Stores outside survey area*														
**stores with a market share >10% from any individual zone*														
Morrisons, Reigate	0.0	0.2	0.0	0.1	0.3	17.5	0.0	0.0	0.7	0.0	0.0	0.0	**19.0**	**1.5%**
Sainsbury's, Bridge Way, Cobham	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	7.9	1.9	6.9	1.7	**18.8**	**1.5%**
Sainsbury's, London Road, Redhill	0.0	0.0	0.0	0.0	0.6	5.5	0.0	0.0	0.0	0.0	0.0	0.0	**6.0**	**0.5%**
Tesco Extra, Beverley Way, New Malden	3.3	4.0	0.3	0.0	0.0	0.0	0.1	0.0	0.0	7.6	3.0	36.2	**54.5**	**4.3%**
Tesco, Hurst Road, West Molesey	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	11.3	0.9	**12.3**	**1.0%**
Other main stores outside survey area	12.2	6.2	26.1	2.1	16.0	6.1	3.3	3.6	10.5	19.4	17.0	89.0	**211.4**	**16.7%**
Sub-total, stores outside survey area (C)	*15.5*	*10.4*	*26.4*	*2.2*	*16.9*	*29.1*	*3.3*	*3.9*	*19.2*	*29.1*	*38.2*	*127.8*	***322.0***	***25.5%***
Total for stores outside Borough & survey area (B+C)	**51.0**	**101.4**	**192.9**	**40.3**	**38.2**	**41.6**	**39.3**	**55.2**	**73.1**	**74.2**	**75.7**	**235.9**	**1,018.7**	***80.6%***
Local convenience goods														
Local shops & other, Epsom town centre	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**0.4**	**0.0%**
Local shops & other, elsewhere in Epsom & Ewell Borough	1.5	0.6	0.2	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	**2.6**	**0.2%**
Local shops, elsewhere in survey area (outside E&E Borough)	0.0	2.1	3.9	1.0	0.4	0.9	1.1	1.6	2.7	1.1	3.4	4.2	**22.5**	**1.8%**
Total for local shops (D)	**2.0**	**2.7**	**4.0**	**1.0**	**0.4**	**0.9**	**1.5**	**1.6**	**2.7**	**1.1**	**3.4**	**4.2**	**25.6**	**2.0%**
Total (A+B+C+D)	**159.9**	**160.3**	**202.5**	**48.7**	**40.4**	**44.1**	**46.2**	**60.6**	**76.4**	**83.2**	**81.7**	**260.5**	**1,264.6**	**100.0%**

Source: Table 3, Table 4

Table 9 - Trading performance of existing convenience floorspace in Epsom & Ewell Borough (main stores)

	Total net floorspace (sq.m)*	Net Conv Ratio (%)	Net Convenience (sqm)	Co Average Sales (£ per sqm net)	Average Turnover 2019 (£m)	Est. Actual Turnover 2019 (£m) (Table 5a)	Inflow (%)	Inflow (£m)	Actual t/over including inflow (£m)	ifference from Avg Turnover 2019 (£m)
Epsom town centre										
Waitrose, Ashley Centre	1,318	90%	1,186	13,431	15.9	12.2	5%	0.6	12.873	-3.1
Marks & Spencer, Ashley Centre	954	94%	897	10,965	9.8	6.4	5%	0.3	6.715	-3.1
Tesco Express, Epsom Station	300	95%	285	12,911	3.7	4.8	10%	0.5	5.363	1.7
Co-Op, Upper High Street	179	95%	170	8,269	1.4	2.4	0%	0.0	2.428	1.0
Co-Op, Station Approach	159	95%	151	8,269	1.2	1.6	10%	0.2	1.747	0.5
Sub-total, Epsom town centre stores	2,910	-	2,689	-	32.1	27.4	-	1.7	29.125	-3.0
Ewell district centre										
Sainsbury's Local, Cheam Road	*250*	95%	238	12,191	2.9	3.3	0%	0.0	3.348	0.5
Co-Op, High Street	235	95%	223	8,269	1.8	1.9	0%	0.0	1.943	0.1
Sub-total, Ewell district centre stores	485	-	461	-	4.7	5.3	-	0.0	5.291	0.5
Stoneleigh district centre										
Sainsbury's Local, Broadway	250	95%	238	12,191	2.9	9.8	0%	0.0	9.758	6.9
Co-Op, Broadway	276	95%	262	8,269	2.2	5.6	0%	0.0	5.576	3.4
Sub-total, Stoneleigh district centre stores	526	-	500	-	5.1	15.3	-	0.0	15.334	10.3
Kingston Road local centre										
Aldi, Kingston Road	1,050	80%	840	9,930	8.3	37.7	0%	0.0	37.653	29.3
Co-op, Kingston Road	*300*	87%	262	8,269	2.2	3.2	0%	0.0	3.164	1.0
Sub-total, Kingston Road local centre stores	1,350	-	1,102	-	10.5	40.8	-	0.0	40.818	30.3
Chessington Road (Green Lanes) local centre										
Co-Op, Chessington Road	*250*	95%	238	8,269	2.0	5.6	0%	0.0	5.591	3.6
Ruxley Lane (Gatley Avenue) local centre										
Tesco Express, Ruxley Lane	*300*	95%	285	12,911	3.7	3.1	0%	0.0	3.119	-0.6
Other stores (not within a defined centre)										
Sainsbury's, Kiln Lane, Epsom	5,107	70%	3,575	12,191	43.6	81.3	2%	1.7	82.951	39.4
Co-Op, Ruxley Lane, West Ewell	*300*	95%	285	8,269	2.4	5.0	0%	0.0	4.974	2.6
Tesco Express, Esso PFS, Reigate Road, Epsom	134	95%	127	12,911	1.6	3.0	0%	0.0	3.018	1.4
Tesco Express, Horton Retail Centre, Epsom	200	95%	190	12,911	2.5	5.1	0%	0.0	5.051	2.6
Sub-total, other stores in Epsom & Ewell (excluding local shops)	5,741	-	4,177	-	50.0	94.3	-	1.7	95.993	46.0
Total for Borough	**11,562**		**9,451**	**11,437**	**108.1**	**191.9**		**3.3**	**195.271**	**87.2**

*Note: Net sales area marked with * are approximations*

Table 10 - Commitments for new convenience goods retail floorspace

Scheme name	Application ref	Proposed floorspace	Proposed floorspace (sq.m net)	Estimated convenience A1 floorspace (%)	Estimated convenience A1 floorspace (net sq.m)	Turnover per sq.m	Estimated turnover 2019	Estimated turnover 2022	Estimated turnover 2027	Estimated turnover 2032	See note
Lidl, Upper High Street, Epsom	17/00001/FUL	-	1,427	80%	1,142	7,098	8.1	8.2	8.3	8.3	1
Total	**-**	**-**	**-**	**-**	**-**	**-**	**8.1**	**8.2**	**8.3**	**8.3**	

Notes to turnover assumptions

1 - Based on assumed company average sales floorspace split of 80% convenience / 20% comparison

Sales density of 0.7% applied 2019-20, 0.4% 2020-21 and 0.2% per annum applied 2021-25, no sales density growth applied thereafter (source: Experian Retail Planner 16, Figure 4a)

Table 11 - Borough-wide convenience goods floorspace capacity

	2019	2022	2027	2032
Residents Spending in Epsom & Ewell Borough (£m)	191.9	200.4	211.1	220.4
Existing convenience shop floorspace within Epsom & Ewell Borough (sq.m net)	9,451	9,451	9,451	9,451
Sales per sq.m net £	20,307	11,437	11,505	11,505
Sales from existing floorspace (£m)	191.9	108.1	108.7	108.7
Sales from committed floorspace (£m)	0.0	8.2	8.3	8.3
Residual spending to support new convenience goods floorspace (£m)	0.0	84.1	94.1	103.4
Sales per sq.m net in new shops (£) *Based on large store format*	12,000	12,157	12,279	12,279
Capacity for new floorspace (sq.m net)	**0**	**6,920**	**7,662**	**8,420**
Capacity for new floorspace (sq.m net, rounded)	**0**	**6,900**	**7,700**	**8,400**

Sales density of 0.7% applied 2019-20, 0.4% 2020-21 and 0.2% per annum applied 2021-25, no sales density growth applied thereafter (source: Experian Retail Planner 16, Figure 4a)

Appendix 3

Comparison Goods Need Forecasts

Table 1 - Survey area population forecasts

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total
2017	*60,784*	*61,958*	*78,034*	*19,056*	*15,653*	*17,212*	*18,189*	*24,738*	*31,570*	*32,419*	*32,893*	*100,776*	***493,282***
2019	62,698	63,779	80,649	19,582	16,081	17,681	18,723	25,329	32,301	33,500	33,854	104,296	**508,473**
2022	65,073	66,003	83,570	20,149	16,611	18,246	19,268	25,798	32,778	34,513	34,616	107,740	**524,365**
2027	68,846	69,322	87,711	21,079	17,453	19,181	20,076	26,588	33,590	36,140	35,785	112,941	**548,712**
2032	72,101	72,253	91,311	21,974	18,235	19,869	20,823	27,335	34,457	37,514	36,831	117,436	**570,139**
Change 2019-32	***9,403***	***8,474***	***10,662***	***2,392***	***2,154***	***2,188***	***2,100***	***2,006***	***2,156***	***4,014***	***2,977***	***13,140***	***61,666***

Source: *Experian Micromarketer (2017-based population forecasts)*

Table 1a - Survey area postcode sectors

Zone	Postal Sectors
Zone 1	KT17 1/3/4 - KT18 5/7 - KT19 7/8/9
Zone 2	KT4 7/8 - KT17 2 - KT19 0 - SM2 7 - SM3 8
Zone 3	SM1 1/2/3/4 - SM2 5/6 - SM3 9
Zone 4	SM7 1/2/3
Zone 5	CR5 3 - KT20 6
Zone 6	KT20 7 - RH2 0/9
Zone 7	KT18 6 - KT20 5 - KT22 8
Zone 8	KT21 1/2 - KT22 0/7
Zone 9	KT11 2/3 - KT22 9 - KT23 3/4
Zone 10	KT9 1/2 - KT10 0
Zone 11	KT7 0 - KT8 0/2 - KT10 8/9
Zone 12	KT3 5/6 - KT5 8/9 - KT6 4/5/6/7 - SM4 4 - SW20 9

Table 2 - Survey area per capita expenditure forecasts, comparison goods

	Expenditure per capita (£)	SFT (%) (Experian)	SFT (£)	Expenditure per capita less SFT
2019	4,927	17.9%	882	4,045
2022	5,404	19.7%	1,065	4,340
2027	6,345	21.1%	1,339	5,006
2032	7,427	21.5%	1,597	5,830

Expenditure growth rates: 2019-20: 2.8%, 2020-25: 3.3% per annum, 2026 onwards: 3.2% per annum. 2017 prices.

Source: Experian E-Marketer. Expenditure growth rates and allowance for SFT are sourced from Experian Retail Planner 16 (December 2018).

Table 3 - Survey area retail expenditure, comparison goods

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Total
	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)
2019	253.60	257.97	326.21	79.20	65.04	71.52	75.73	102.45	130.65	135.50	136.93	421.85	**2,056.65**
2022	282.40	286.43	362.67	87.44	72.09	79.18	83.62	111.96	142.25	149.78	150.22	467.56	**2,275.59**
2027	344.64	347.02	439.07	105.52	87.37	96.02	100.50	133.10	168.15	180.91	179.14	565.37	**2,746.79**
2032	420.35	421.24	532.35	128.11	106.31	115.84	121.40	159.36	200.89	218.71	214.73	684.66	**3,323.94**
Change 2019-32	*166.75*	*163.27*	*206.14*	*48.90*	*41.27*	*44.32*	*45.67*	*56.91*	*70.24*	*83.21*	*77.80*	*262.81*	***1,267.29***

Source: Tables 1 & 2. 2017 prices.

Table 4 - Comparison goods % market share allocation (2019)

Zone Centre/Store	Zone 1 (%)	Zone 2 (%)	Zone 3 (%)	Zone 4 (%)	Zone 5 (%)	Zone 6 (%)	Zone 7 (%)	Zone 8 (%)	Zone 9 (%)	Zone 10 (%)	Zone 11 (%)	Zone 12 (%)
Comparison goods floorspace in Epsom & Ewell Borough												
Town centres												
Epsom town centre (zone 1)	37.29%	14.06%	1.04%	13.89%	5.62%	7.05%	27.68%	21.36%	4.91%	4.61%	2.00%	1.12%
District centres												
Ewell Village (zone 1)	0.86%	1.40%	0.03%	0.00%	0.00%	0.00%	0.32%	0.00%	0.00%	0.00%	0.00%	0.00%
Stoneleigh (Broadway) (zone 2)	0.22%	2.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Sub-total	*1.08%*	*3.53%*	*0.03%*	*0.00%*	*0.00%*	*0.00%*	*0.32%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*
Local centres												
All local centres in Epsom & Ewell Borough (zones 1/2)	1.00%	0.84%	0.00%	0.13%	1.40%	0.00%	0.23%	0.00%	0.05%	0.00%	0.00%	0.00%
Out-of-centre												
Kiln Lane retail warehousing, Epsom	2.50%	1.07%	0.00%	0.66%	0.47%	0.96%	0.75%	0.53%	0.32%	0.04%	0.00%	0.00%
Sainsbury's, Kiln Lane, Epsom (includes in-store Argos & Habitat)	8.52%	1.68%	0.00%	0.87%	0.00%	0.20%	0.71%	0.52%	0.00%	2.12%	0.00%	0.28%
Homebase, Reigate Road, Ewell	2.87%	1.90%	0.04%	0.82%	2.73%	0.15%	1.26%	0.05%	0.06%	0.37%	0.06%	0.00%
Sub-total	*13.89%*	*4.64%*	*0.04%*	*2.36%*	*3.20%*	*1.31%*	*2.72%*	*1.10%*	*0.38%*	*2.54%*	*0.06%*	*0.28%*
Sub-total, comparison goods floorspace in Epsom & Ewell Borough (A)	**53.26%**	**23.06%**	**1.11%**	**16.38%**	**10.22%**	**8.36%**	**30.95%**	**22.47%**	**5.34%**	**7.15%**	**2.06%**	**1.40%**
Comparison goods floorspace elsewhere in survey area (outside Epsom & Ewell Borough)												
Town centres												
Worcester Park district centre (zone 2)	0.00%	3.97%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.27%
Cheam district centre (zone 2)	0.16%	2.75%	1.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Sutton town centre (zone 3)	1.95%	17.61%	45.16%	17.74%	11.27%	0.53%	1.87%	3.93%	0.98%	0.78%	0.00%	6.94%
Banstead town centre (zone 4)	0.49%	0.40%	0.00%	17.82%	6.80%	0.59%	2.09%	0.12%	0.00%	0.00%	0.00%	0.11%
Reigate town centre (zone 5)	0.22%	0.06%	0.14%	1.41%	2.06%	29.16%	1.77%	0.17%	1.52%	0.00%	0.00%	0.11%
Leatherhead town centre (zone 7)	0.34%	0.00%	0.00%	0.59%	0.00%	0.13%	10.81%	12.82%	11.13%	0.00%	0.00%	0.00%
Ashtead village centre (zone 8)	0.20%	0.00%	0.00%	0.09%	0.00%	0.00%	1.22%	12.90%	1.15%	0.00%	0.00%	0.00%
Bookham district centre (zone 9)	0.00%	0.00%	0.30%	0.00%	0.33%	0.00%	0.00%	0.00%	5.58%	0.00%	0.00%	0.00%
Cobham town centre (zone 9)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.70%	1.62%	5.89%	0.00%	1.45%	0.49%
Esher town centre (zone 11)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.11%	0.00%	2.02%	3.68%	0.00%
Surbiton town centre (zone 12)	0.00%	0.00%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08%	4.00%	4.60%	6.19%
Other town centres within survey area (outside Epsom & Ewell Borough)	1.31%	0.80%	0.00%	0.64%	1.96%	2.29%	2.57%	1.87%	2.40%	4.85%	5.25%	0.82%
Out-of-centre / retail warehousing												
B&Q, Sutton Court Road, Sutton (zone 3)	0.45%	1.52%	3.35%	3.33%	1.56%	0.19%	1.06%	0.05%	0.00%	0.00%	0.00%	0.31%
Sainsbury's, London Road, North Cheam (zone 3)	0.00%	2.86%	1.18%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.98%
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.00%	1.13%	2.66%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Asda, Reigate Road, Burgh Heath (zone 7)	1.49%	0.00%	0.17%	2.76%	6.23%	0.87%	5.88%	0.34%	0.56%	0.32%	0.00%	0.00%
Other out-of-centre / retail warehousing within survey area (outside E&E Borough)	0.61%	0.00%	0.95%	0.08%	0.38%	3.04%	1.77%	5.83%	5.50%	2.09%	0.30%	0.04%
Sub-total, other comparison goods floorspace in survey area (B)	**7.22%**	**31.10%**	**55.20%**	**44.62%**	**30.71%**	**36.80%**	**29.73%**	**39.76%**	**34.79%**	**14.07%**	**15.27%**	**16.27%**
Comparison goods floorspace outside survey area												
Town centres												
Kingston-upon-Thames town centre	20.36%	24.07%	9.53%	10.93%	7.10%	3.80%	13.43%	16.63%	13.60%	51.98%	54.66%	40.48%
Guildford town centre	1.05%	0.17%	0.00%	1.89%	0.32%	3.34%	5.40%	5.24%	28.32%	1.09%	1.14%	0.55%
Central London / City of London	1.82%	1.21%	0.38%	1.95%	3.21%	1.46%	3.41%	2.06%	0.09%	1.10%	4.26%	1.21%
Croydon town centre	0.35%	0.65%	0.90%	4.11%	7.53%	0.77%	1.08%	0.62%	0.00%	0.00%	0.00%	0.36%
Redhill town centre	0.24%	0.00%	0.00%	0.59%	2.56%	19.07%	0.94%	0.00%	0.16%	0.00%	0.00%	0.00%
Crawley town centre	0.06%	0.00%	0.00%	0.00%	0.75%	5.22%	1.30%	0.00%	0.20%	0.00%	0.65%	0.00%
Out-of-centre / retail warehousing												
Purley Way retail warehousing, Croydon	4.91%	4.61%	16.20%	12.45%	17.74%	4.65%	6.79%	2.79%	3.03%	1.33%	1.22%	4.08%
New Malden retail warehousing	7.38%	8.03%	4.19%	1.75%	0.85%	0.21%	1.04%	2.82%	0.87%	17.71%	7.75%	18.25%
Other	2.91%	5.90%	12.28%	4.86%	17.55%	15.42%	5.88%	7.61%	13.36%	4.45%	12.89%	17.19%
Sub-total, comparison goods floorspace outside survey area (C)	**39.07%**	**44.65%**	**43.49%**	**38.52%**	**57.61%**	**53.94%**	**39.28%**	**37.77%**	**59.64%**	**77.66%**	**82.58%**	**82.12%**
Local / other shops in survey area (D)	**0.45%**	**1.20%**	**0.20%**	**0.48%**	**1.46%**	**0.90%**	**0.04%**	**0.00%**	**0.24%**	**1.12%**	**0.08%**	**0.21%**
Overall total (A+B+C+D)	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

Source: NEMS Market Research Telephone Survey, August 2019

Table 5a - Comparison goods spend (£m) 2019

Zone Centre/Store	Zone 1 (£m)	Zone 2 (£m)	Zone 3 (£m)	Zone 4 (£m)	Zone 5 (£m)	Zone 6 (£m)	Zone 7 (£m)	Zone 8 (£m)	Zone 9 (£m)	Zone 10 (£m)	Zone 11 (£m)	Zone 12 (£m)	Total (£m)	*Total* *(%)*
Total Available Spend - 2019	**253.6**	**258.0**	**326.2**	**79.2**	**65.0**	**71.5**	**75.7**	**102.4**	**130.7**	**135.5**	**136.9**	**421.9**	**2,056.7**	***100.0***
Comparison goods floorspace in Epsom & Ewell Borough														
Town centres														
Epsom town centre (zone 1)	94.6	36.3	3.4	11.0	3.7	5.0	21.0	21.9	6.4	6.2	2.7	4.7	216.9	10.5%
District centres														
Ewell Village (zone 1)	2.2	3.6	0.1	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	6.2	0.3%
Stoneleigh (Broadway) (zone 2)	0.6	5.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.0	0.3%
Sub-total	*2.7*	*9.1*	*0.1*	*0.0*	*0.0*	*0.0*	*0.2*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*12.2*	*0.6%*
Local centres														
All local centres in Epsom & Ewell Borough (zones 1/2)	2.5	2.2	0.0	0.1	0.9	0.0	0.2	0.0	0.1	0.0	0.0	0.0	5.9	0.3%
Out-of-centre														
Kiln Lane retail warehousing, Epsom	6.3	2.8	0.0	0.5	0.3	0.7	0.6	0.5	0.4	0.1	0.0	0.0	12.2	0.6%
Sainsbury's, Kiln Lane, Epsom (includes in-store Argos & Habitat)	21.6	4.3	0.0	0.7	0.0	0.1	0.5	0.5	0.0	2.9	0.0	1.2	31.9	1.5%
Homebase, Reigate Road, Ewell	7.3	4.9	0.1	0.7	1.8	0.1	1.0	0.1	0.1	0.5	0.1	0.0	16.5	0.8%
Sub-total	*35.2*	*12.0*	*0.1*	*1.9*	*2.1*	*0.9*	*2.1*	*1.1*	*0.5*	*3.4*	*0.1*	*1.2*	*60.6*	*2.9%*
Sub-total, comparison goods floorspace in Epsom & Ewell Borough (A)	**135.1**	**59.5**	**3.6**	**13.0**	**6.6**	**6.0**	**23.4**	**23.0**	**7.0**	**9.7**	**2.8**	**5.9**	**295.6**	**14.4%**
Comparison goods floorspace elsewhere in survey area (outside Epsom & Ewell Borough)														
Town centres														
Worcester Park district centre (zone 2)	0.0	10.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.1	11.4	0.6%
Cheam district centre (zone 2)	0.4	7.1	3.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	11.2	0.5%
Sutton town centre (zone 3)	5.0	45.4	147.3	14.1	7.3	0.4	1.4	4.0	1.3	1.1	0.0	29.3	256.5	12.5%
Banstead town centre (zone 4)	1.2	1.0	0.0	14.1	4.4	0.4	1.6	0.1	0.0	0.0	0.0	0.5	23.4	1.1%
Reigate town centre (zone 5)	0.6	0.1	0.4	1.1	1.3	20.9	1.3	0.2	2.0	0.0	0.0	0.5	28.4	1.4%
Leatherhead town centre (zone 7)	0.9	0.0	0.0	0.5	0.0	0.1	8.2	13.1	14.5	0.0	0.0	0.0	37.3	1.8%
Ashtead village centre (zone 8)	0.5	0.0	0.0	0.1	0.0	0.0	0.9	13.2	1.5	0.0	0.0	0.0	16.2	0.8%
Bookham district centre (zone 9)	0.0	0.0	1.0	0.0	0.2	0.0	0.0	0.0	7.3	0.0	0.0	0.0	8.5	0.4%
Cobham town centre (zone 9)	0.0	0.0	0.0	0.0	0.0	0.0	0.5	1.7	7.7	0.0	2.0	2.1	13.9	0.7%
Esher town centre (zone 11)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	2.7	5.0	0.0	7.9	0.4%
Surbiton town centre (zone 12)	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.1	5.4	6.3	26.1	38.5	1.9%
Other town centres within survey area (outside Epsom & Ewell Borough)	3.3	2.1	0.0	0.5	1.3	1.6	1.9	1.9	3.1	6.6	7.2	3.5	33.0	1.6%
Out-of-centre / retail warehousing														
B&Q, Sutton Court Road, Sutton (zone 3)	1.1	3.9	10.9	2.6	1.0	0.1	0.8	0.1	0.0	0.0	0.0	1.3	22.0	1.1%
Sainsbury's, London Road, North Cheam (zone 3)	0.0	7.4	3.8	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.1	15.5	0.8%
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.0	2.9	8.7	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	11.7	0.6%
Asda, Reigate Road, Burgh Heath (zone 7)	3.8	0.0	0.5	2.2	4.1	0.6	4.5	0.3	0.7	0.4	0.0	0.0	17.2	0.8%
Other out-of-centre / retail warehousing within survey area (outside E&E Borough)	1.5	0.0	3.1	0.1	0.2	2.2	1.3	6.0	7.2	2.8	0.4	0.2	25.0	1.2%
Sub-total, other comparison goods floorspace in survey area (B)	**18.3**	**80.2**	**180.1**	**35.3**	**20.0**	**26.3**	**22.5**	**40.7**	**45.5**	**19.1**	**20.9**	**68.6**	**577.6**	**28.1%**
Comparison goods floorspace outside survey area														
Town centres														
Kingston-upon-Thames town centre	51.6	62.1	31.1	8.7	4.6	2.7	10.2	17.0	17.8	70.4	74.9	170.8	521.8	25.4%
Guildford town centre	2.7	0.4	0.0	1.5	0.2	2.4	4.1	5.4	37.0	1.5	1.6	2.3	59.1	2.9%
Central London / City of London	4.6	3.1	1.3	1.5	2.1	1.0	2.6	2.1	0.1	1.5	5.8	5.1	30.9	1.5%
Croydon town centre	0.9	1.7	2.9	3.3	4.9	0.5	0.8	0.6	0.0	0.0	0.0	1.5	17.2	0.8%
Redhill town centre	0.6	0.0	0.0	0.5	1.7	13.6	0.7	0.0	0.2	0.0	0.0	0.0	17.3	0.8%
Crawley town centre	0.2	0.0	0.0	0.0	0.5	3.7	1.0	0.0	0.3	0.0	0.9	0.0	6.5	0.3%
Out-of-centre / retail warehousing														
Purley Way retail warehousing, Croydon	12.4	11.9	52.8	9.9	11.5	3.3	5.1	2.9	4.0	1.8	1.7	17.2	134.5	6.5%
New Malden retail warehousing	18.7	20.7	13.7	1.4	0.6	0.1	0.8	2.9	1.1	24.0	10.6	77.0	171.6	8.3%
Other	7.4	15.2	40.1	3.8	11.4	11.0	4.5	7.8	17.5	6.0	17.7	72.5	214.9	10.4%
Sub-total, comparison goods floorspace outside survey area (C)	**99.1**	**115.2**	**141.9**	**30.5**	**37.5**	**38.6**	**29.7**	**38.7**	**77.9**	**105.2**	**113.1**	**346.4**	**1,173.8**	**57.1%**
Local / other shops in survey area (D)	1.1	3.1	0.6	0.4	1.0	0.6	0.0	0.0	0.3	1.5	0.1	0.9	9.7	0.5%
Overall total (A+B+C+D)	**253.6**	**258.0**	**326.2**	**79.2**	**65.0**	**71.5**	**75.7**	**102.4**	**130.7**	**135.5**	**136.9**	**421.9**	**2,056.7**	**100.0%**

Source: Table 3, Table 4. 2017 prices.

Table 5b - Comparison goods spend (£m) 2022

Zone Centre/Store	Zone 1 (£m)	Zone 2 (£m)	Zone 3 (£m)	Zone 4 (£m)	Zone 5 (£m)	Zone 6 (£m)	Zone 7 (£m)	Zone 8 (£m)	Zone 9 (£m)	Zone 10 (£m)	Zone 11 (£m)	Zone 12 (£m)	Total (£m)	*Total* *(%)*
Total Available Spend - 2022	**282.4**	**286.4**	**362.7**	**87.4**	**72.1**	**79.2**	**83.6**	**112.0**	**142.2**	**149.8**	**150.2**	**467.6**	**2,275.6**	***100.0***
Comparison goods floorspace in Epsom & Ewell Borough														
Town centres														
Epsom town centre (zone 1)	105.3	40.3	3.8	12.1	4.1	5.6	23.1	23.9	7.0	6.9	3.0	5.3	240.3	10.6%
District centres														
Ewell Village (zone 1)	2.4	4.0	0.1	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	6.8	0.3%
Stoneleigh (Broadway) (zone 2)	0.6	6.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.7	0.3%
Sub-total	*3.1*	*10.1*	*0.1*	*0.0*	*0.0*	*0.0*	*0.3*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*13.5*	*0.6%*
Local centres														
All local centres in Epsom & Ewell Borough (zones 1/2)	2.8	2.4	0.0	0.1	1.0	0.0	0.2	0.0	0.1	0.0	0.0	0.0	6.6	0.3%
Out-of-centre														
Kiln Lane retail warehousing, Epsom	7.0	3.1	0.0	0.6	0.3	0.8	0.6	0.6	0.5	0.1	0.0	0.0	13.5	0.6%
Sainsbury's, Kiln Lane, Epsom (includes in-store Argos & Habitat)	24.1	4.8	0.0	0.8	0.0	0.2	0.6	0.6	0.0	3.2	0.0	1.3	35.4	1.6%
Homebase, Reigate Road, Ewell	8.1	5.4	0.2	0.7	2.0	0.1	1.1	0.1	0.1	0.6	0.1	0.0	18.3	0.8%
Sub-total	*39.2*	*13.3*	*0.2*	*2.1*	*2.3*	*1.0*	*2.3*	*1.2*	*0.5*	*3.8*	*0.1*	*1.3*	*67.3*	*3.0%*
Sub-total, comparison goods floorspace in Epsom & Ewell Borough (A)	**150.4**	**66.0**	**4.0**	**14.3**	**7.4**	**6.6**	**25.9**	**25.2**	**7.6**	**10.7**	**3.1**	**6.5**	**327.8**	**14.4%**
Comparison goods floorspace elsewhere in survey area (outside Epsom & Ewell Borough)														
Town centres														
Worcester Park district centre (zone 2)	0.0	11.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	12.6	0.6%
Cheam district centre (zone 2)	0.5	7.9	4.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	12.4	0.5%
Sutton town centre (zone 3)	5.5	50.4	163.8	15.5	8.1	0.4	1.6	4.4	1.4	1.2	0.0	32.4	284.7	12.5%
Banstead town centre (zone 4)	1.4	1.2	0.0	15.6	4.9	0.5	1.7	0.1	0.0	0.0	0.0	0.5	25.9	1.1%
Reigate town centre (zone 5)	0.6	0.2	0.5	1.2	1.5	23.1	1.5	0.2	2.2	0.0	0.0	0.5	31.4	1.4%
Leatherhead town centre (zone 7)	0.9	0.0	0.0	0.5	0.0	0.1	9.0	14.3	15.8	0.0	0.0	0.0	40.8	1.8%
Ashtead village centre (zone 8)	0.6	0.0	0.0	0.1	0.0	0.0	1.0	14.4	1.6	0.0	0.0	0.0	17.7	0.8%
Bookham district centre (zone 9)	0.0	0.0	1.1	0.0	0.2	0.0	0.0	0.0	7.9	0.0	0.0	0.0	9.3	0.4%
Cobham town centre (zone 9)	0.0	0.0	0.0	0.0	0.0	0.0	0.6	1.8	8.4	0.0	2.2	2.3	15.3	0.7%
Esher town centre (zone 11)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	3.0	5.5	0.0	8.7	0.4%
Surbiton town centre (zone 12)	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.1	6.0	6.9	29.0	42.6	1.9%
Other town centres within survey area (outside Epsom & Ewell Borough)	3.7	2.3	0.0	0.6	1.4	1.8	2.2	2.1	3.4	7.3	7.9	3.8	36.4	1.6%
Out-of-centre / retail warehousing														
B&Q, Sutton Court Road, Sutton (zone 3)	1.3	4.4	12.1	2.9	1.1	0.1	0.9	0.1	0.0	0.0	0.0	1.5	24.4	1.1%
Sainsbury's, London Road, North Cheam (zone 3)	0.0	8.2	4.3	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.6	17.2	0.8%
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.0	3.2	9.7	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	13.0	0.6%
Asda, Reigate Road, Burgh Heath (zone 7)	4.2	0.0	0.6	2.4	4.5	0.7	4.9	0.4	0.8	0.5	0.0	0.0	19.0	0.8%
Other out-of-centre / retail warehousing within survey area (outside E&E Borough)	1.7	0.0	3.4	0.1	0.3	2.4	1.5	6.5	7.8	3.1	0.4	0.2	27.5	1.2%
Sub-total, other comparison goods floorspace in survey area (B)	**20.4**	**89.1**	**200.2**	**39.0**	**22.1**	**29.1**	**24.9**	**44.5**	**49.5**	**21.1**	**22.9**	**76.1**	**638.9**	**28.1%**
Comparison goods floorspace outside survey area														
Town centres														
Kingston-upon-Thames town centre	57.5	69.0	34.5	9.6	5.1	3.0	11.2	18.6	19.3	77.9	82.1	189.3	577.1	25.4%
Guildford town centre	3.0	0.5	0.0	1.6	0.2	2.6	4.5	5.9	40.3	1.6	1.7	2.6	64.6	2.8%
Central London / City of London	5.1	3.5	1.4	1.7	2.3	1.2	2.9	2.3	0.1	1.7	6.4	5.6	34.1	1.5%
Croydon town centre	1.0	1.9	3.3	3.6	5.4	0.6	0.9	0.7	0.0	0.0	0.0	1.7	19.0	0.8%
Redhill town centre	0.7	0.0	0.0	0.5	1.8	15.1	0.8	0.0	0.2	0.0	0.0	0.0	19.2	0.8%
Crawley town centre	0.2	0.0	0.0	0.0	0.5	4.1	1.1	0.0	0.3	0.0	1.0	0.0	7.2	0.3%
Out-of-centre / retail warehousing														
Purley Way retail warehousing, Croydon	13.9	13.2	58.8	10.9	12.8	3.7	5.7	3.1	4.3	2.0	1.8	19.1	149.2	6.6%
New Malden retail warehousing	20.8	23.0	15.2	1.5	0.6	0.2	0.9	3.2	1.2	26.5	11.6	85.3	190.1	8.4%
Other	8.2	16.9	44.5	4.2	12.7	12.2	4.9	8.5	19.0	6.7	19.4	80.4	237.6	10.4%
Sub-total, comparison goods floorspace outside survey area (C)	**110.3**	**127.9**	**157.7**	**33.7**	**41.5**	**42.7**	**32.8**	**42.3**	**84.8**	**116.3**	**124.1**	**383.9**	**1,298.1**	**57.0%**
Local / other shops in survey area (D)	1.3	3.4	0.7	0.4	1.1	0.7	0.0	0.0	0.3	1.7	0.1	1.0	10.8	0.5%
Overall total (A+B+C+D)	**282.4**	**286.4**	**362.7**	**87.4**	**72.1**	**79.2**	**83.6**	**112.0**	**142.2**	**149.8**	**150.2**	**467.6**	**2,275.6**	**100.0%**

Source: Table 3, Table 4. 2017 prices.

Table 5c - Comparison goods spend (£m) 2027

Zone Centre/Store	Zone 1 (£m)	Zone 2 (£m)	Zone 3 (£m)	Zone 4 (£m)	Zone 5 (£m)	Zone 6 (£m)	Zone 7 (£m)	Zone 8 (£m)	Zone 9 (£m)	Zone 10 (£m)	Zone 11 (£m)	Zone 12 (£m)	Total (£m)	*Total* *(%)*
Total Available Spend - 2027	**344.6**	**347.0**	**439.1**	**105.5**	**87.4**	**96.0**	**100.5**	**133.1**	**168.1**	**180.9**	**179.1**	**565.4**	**2,746.8**	***100.0***
Comparison goods floorspace in Epsom & Ewell Borough														
Town centres														
Epsom town centre (zone 1)	128.5	48.8	4.6	14.7	4.9	6.8	27.8	28.4	8.3	8.3	3.6	6.4	291.0	10.6%
District centres														
Ewell Village (zone 1)	3.0	4.9	0.1	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	8.3	0.3%
Stoneleigh (Broadway) (zone 2)	0.8	7.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	8.1	0.3%
Sub-total	*3.7*	*12.2*	*0.1*	*0.0*	*0.0*	*0.0*	*0.3*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*16.4*	*0.6%*
Local centres														
All local centres in Epsom & Ewell Borough (zones 1/2)	3.4	2.9	0.0	0.1	1.2	0.0	0.2	0.0	0.1	0.0	0.0	0.0	8.0	0.3%
Out-of-centre														
Kiln Lane retail warehousing, Epsom	8.6	3.7	0.0	0.7	0.4	0.9	0.8	0.7	0.5	0.1	0.0	0.0	16.4	0.6%
Sainsbury's, Kiln Lane, Epsom (includes in-store Argos & Habitat)	29.4	5.8	0.0	0.9	0.0	0.2	0.7	0.7	0.0	3.8	0.0	1.6	43.1	1.6%
Homebase, Reigate Road, Ewell	9.9	6.6	0.2	0.9	2.4	0.1	1.3	0.1	0.1	0.7	0.1	0.0	22.3	0.8%
Sub-total	*47.9*	*16.1*	*0.2*	*2.5*	*2.8*	*1.3*	*2.7*	*1.5*	*0.6*	*4.6*	*0.1*	*1.6*	*81.8*	*3.0%*
Sub-total, comparison goods floorspace in Epsom & Ewell Borough (A)	**183.5**	**80.0**	**4.9**	**17.3**	**8.9**	**8.0**	**31.1**	**29.9**	**9.0**	**12.9**	**3.7**	**7.9**	**397.2**	**14.5%**
Comparison goods floorspace elsewhere in survey area (outside Epsom & Ewell Borough)														
Town centres														
Worcester Park district centre (zone 2)	0.0	13.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.5	15.3	0.6%
Cheam district centre (zone 2)	0.6	9.5	5.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	15.1	0.5%
Sutton town centre (zone 3)	6.7	61.1	198.3	18.7	9.8	0.5	1.9	5.2	1.6	1.4	0.0	39.2	344.6	12.5%
Banstead town centre (zone 4)	1.7	1.4	0.0	18.8	5.9	0.6	2.1	0.2	0.0	0.0	0.0	0.6	31.3	1.1%
Reigate town centre (zone 5)	0.8	0.2	0.6	1.5	1.8	28.0	1.8	0.2	2.6	0.0	0.0	0.6	38.0	1.4%
Leatherhead town centre (zone 7)	1.2	0.0	0.0	0.6	0.0	0.1	10.9	17.1	18.7	0.0	0.0	0.0	48.5	1.8%
Ashtead village centre (zone 8)	0.7	0.0	0.0	0.1	0.0	0.0	1.2	17.2	1.9	0.0	0.0	0.0	21.1	0.8%
Bookham district centre (zone 9)	0.0	0.0	1.3	0.0	0.3	0.0	0.0	0.0	9.4	0.0	0.0	0.0	11.0	0.4%
Cobham town centre (zone 9)	0.0	0.0	0.0	0.0	0.0	0.0	0.7	2.2	9.9	0.0	2.6	2.8	18.1	0.7%
Esher town centre (zone 11)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	3.7	6.6	0.0	10.4	0.4%
Surbiton town centre (zone 12)	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.1	7.2	8.2	35.0	51.3	1.9%
Other town centres within survey area (outside Epsom & Ewell Borough)	4.5	2.8	0.0	0.7	1.7	2.2	2.6	2.5	4.0	8.8	9.4	4.6	43.8	1.6%
Out-of-centre / retail warehousing														
B&Q, Sutton Court Road, Sutton (zone 3)	1.6	5.3	14.7	3.5	1.4	0.2	1.1	0.1	0.0	0.0	0.0	1.8	29.5	1.1%
Sainsbury's, London Road, North Cheam (zone 3)	0.0	9.9	5.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.5	20.8	0.8%
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.0	3.9	11.7	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	15.7	0.6%
Asda, Reigate Road, Burgh Heath (zone 7)	5.1	0.0	0.7	2.9	5.4	0.8	5.9	0.4	0.9	0.6	0.0	0.0	22.9	0.8%
Other out-of-centre / retail warehousing within survey area (outside E&E Borough)	2.1	0.0	4.2	0.1	0.3	2.9	1.8	7.8	9.2	3.8	0.5	0.3	32.9	1.2%
Sub-total, other comparison goods floorspace in survey area (B)	**24.9**	**107.9**	**242.4**	**47.1**	**26.8**	**35.3**	**29.9**	**52.9**	**58.5**	**25.5**	**27.4**	**92.0**	**770.5**	**28.1%**
Comparison goods floorspace outside survey area														
Town centres														
Kingston-upon-Thames town centre	70.2	83.5	41.8	11.5	6.2	3.7	13.5	22.1	22.9	94.0	97.9	228.8	696.2	25.3%
Guildford town centre	3.6	0.6	0.0	2.0	0.3	3.2	5.4	7.0	47.6	2.0	2.0	3.1	76.9	2.8%
Central London / City of London	6.3	4.2	1.7	2.1	2.8	1.4	3.4	2.7	0.2	2.0	7.6	6.8	41.2	1.5%
Croydon town centre	1.2	2.3	4.0	4.3	6.6	0.7	1.1	0.8	0.0	0.0	0.0	2.0	23.0	0.8%
Redhill town centre	0.8	0.0	0.0	0.6	2.2	18.3	0.9	0.0	0.3	0.0	0.0	0.0	23.2	0.8%
Crawley town centre	0.2	0.0	0.0	0.0	0.7	5.0	1.3	0.0	0.3	0.0	1.2	0.0	8.7	0.3%
Out-of-centre / retail warehousing														
Purley Way retail warehousing, Croydon	16.9	16.0	71.1	13.1	15.5	4.5	6.8	3.7	5.1	2.4	2.2	23.0	180.4	6.6%
New Malden retail warehousing	25.4	27.9	18.4	1.8	0.7	0.2	1.0	3.8	1.5	32.0	13.9	103.2	229.9	8.4%
Other	10.0	20.5	53.9	5.1	15.3	14.8	5.9	10.1	22.5	8.0	23.1	97.2	286.5	10.4%
Sub-total, comparison goods floorspace outside survey area (C)	**134.7**	**154.9**	**190.9**	**40.6**	**50.3**	**51.8**	**39.5**	**50.3**	**100.3**	**140.5**	**147.9**	**464.3**	**1,566.0**	**57.0%**
Local / other shops in survey area (D)	1.5	4.2	0.9	0.5	1.3	0.9	0.0	0.0	0.4	2.0	0.2	1.2	13.0	0.5%
Overall total (A+B+C+D)	**344.6**	**347.0**	**439.1**	**105.5**	**87.4**	**96.0**	**100.5**	**133.1**	**168.1**	**180.9**	**179.1**	**565.4**	**2,746.8**	**100.0%**

Source: Table 3, Table 4. 2017 prices.

Table 5d - Comparison goods spend (£m) 2032

Zone Centre/Store	Zone 1 (£m)	Zone 2 (£m)	Zone 3 (£m)	Zone 4 (£m)	Zone 5 (£m)	Zone 6 (£m)	Zone 7 (£m)	Zone 8 (£m)	Zone 9 (£m)	Zone 10 (£m)	Zone 11 (£m)	Zone 12 (£m)	Total (£m)	*Total* *(%)*
Total Available Spend - 2032	**420.4**	**421.2**	**532.3**	**128.1**	**106.3**	**115.8**	**121.4**	**159.4**	**200.9**	**218.7**	**214.7**	**684.7**	**3,323.9**	***100.0***
Comparison goods floorspace in Epsom & Ewell Borough														
Town centres														
Epsom town centre (zone 1)	156.7	59.2	5.5	17.8	6.0	8.2	33.6	34.0	9.9	10.1	4.3	7.7	353.0	10.6%
District centres														
Ewell Village (zone 1)	3.6	5.9	0.2	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	10.1	0.3%
Stoneleigh (Broadway) (zone 2)	0.9	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	9.9	0.3%
Sub-total	*4.5*	*14.9*	*0.2*	*0.0*	*0.0*	*0.0*	*0.4*	*0.0*	*0.0*	*0.0*	*0.0*	*0.0*	*20.0*	*0.6%*
Local centres														
All local centres in Epsom & Ewell Borough (zones 1/2)	4.2	3.5	0.0	0.2	1.5	0.0	0.3	0.0	0.1	0.0	0.0	0.0	9.8	0.3%
Out-of-centre														
Kiln Lane retail warehousing, Epsom	10.5	4.5	0.0	0.8	0.5	1.1	0.9	0.8	0.6	0.1	0.0	0.0	20.0	0.6%
Sainsbury's, Kiln Lane, Epsom (includes in-store Argos & Habitat)	35.8	7.1	0.0	1.1	0.0	0.2	0.9	0.8	0.0	4.6	0.0	1.9	52.4	1.6%
Homebase, Reigate Road, Ewell	12.1	8.0	0.2	1.1	2.9	0.2	1.5	0.1	0.1	0.8	0.1	0.0	27.1	0.8%
Sub-total	*58.4*	*19.6*	*0.2*	*3.0*	*3.4*	*1.5*	*3.3*	*1.8*	*0.8*	*5.5*	*0.1*	*1.9*	*99.5*	*3.0%*
Sub-total, comparison goods floorspace in Epsom & Ewell Borough (A)	**223.9**	**97.1**	**5.9**	**21.0**	**10.9**	**9.7**	**37.6**	**35.8**	**10.7**	**15.6**	**4.4**	**9.6**	**482.2**	**14.5%**
Comparison goods floorspace elsewhere in survey area (outside Epsom & Ewell Borough)														
Town centres														
Worcester Park district centre (zone 2)	0.0	16.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.9	18.6	0.6%
Cheam district centre (zone 2)	0.7	11.6	6.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	18.3	0.6%
Sutton town centre (zone 3)	8.2	74.2	240.4	22.7	12.0	0.6	2.3	6.3	2.0	1.7	0.0	47.5	417.8	12.6%
Banstead town centre (zone 4)	2.1	1.7	0.0	22.8	7.2	0.7	2.5	0.2	0.0	0.0	0.0	0.8	38.0	1.1%
Reigate town centre (zone 5)	0.9	0.2	0.7	1.8	2.2	33.8	2.1	0.3	3.1	0.0	0.0	0.8	45.9	1.4%
Leatherhead town centre (zone 7)	1.4	0.0	0.0	0.8	0.0	0.2	13.1	20.4	22.4	0.0	0.0	0.0	58.2	1.8%
Ashtead village centre (zone 8)	0.8	0.0	0.0	0.1	0.0	0.0	1.5	20.6	2.3	0.0	0.0	0.0	25.3	0.8%
Bookham district centre (zone 9)	0.0	0.0	1.6	0.0	0.3	0.0	0.0	0.0	11.2	0.0	0.0	0.0	13.2	0.4%
Cobham town centre (zone 9)	0.0	0.0	0.0	0.0	0.0	0.0	0.9	2.6	11.8	0.0	3.1	3.4	21.7	0.7%
Esher town centre (zone 11)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	4.4	7.9	0.0	12.5	0.4%
Surbiton town centre (zone 12)	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.2	8.7	9.9	42.4	62.1	1.9%
Other town centres within survey area (outside Epsom & Ewell Borough)	5.5	3.4	0.0	0.8	2.1	2.7	3.1	3.0	4.8	10.6	11.3	5.6	52.8	1.6%
Out-of-centre / retail warehousing														
B&Q, Sutton Court Road, Sutton (zone 3)	1.9	6.4	17.8	4.3	1.7	0.2	1.3	0.1	0.0	0.0	0.0	2.1	35.8	1.1%
Sainsbury's, London Road, North Cheam (zone 3)	0.0	12.0	6.3	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.7	25.2	0.8%
Tesco Extra, Oldfields Road, Sutton (zone 3)	0.0	4.8	14.2	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	19.1	0.6%
Asda, Reigate Road, Burgh Heath (zone 7)	6.3	0.0	0.9	3.5	6.6	1.0	7.1	0.5	1.1	0.7	0.0	0.0	27.8	0.8%
Other out-of-centre / retail warehousing within survey area (outside E&E Borough)	2.6	0.0	5.0	0.1	0.4	3.5	2.1	9.3	11.1	4.6	0.6	0.3	39.6	1.2%
Sub-total, other comparison goods floorspace in survey area (B)	**30.4**	**131.0**	**293.9**	**57.2**	**32.6**	**42.6**	**36.1**	**63.4**	**69.9**	**30.8**	**32.8**	**111.4**	**932.0**	**28.0%**
Comparison goods floorspace outside survey area														
Town centres														
Kingston-upon-Thames town centre	85.6	101.4	50.7	14.0	7.6	4.4	16.3	26.5	27.3	113.7	117.4	277.1	842.0	25.3%
Guildford town centre	4.4	0.7	0.0	2.4	0.3	3.9	6.6	8.4	56.9	2.4	2.5	3.8	92.2	2.8%
Central London / City of London	7.6	5.1	2.0	2.5	3.4	1.7	4.1	3.3	0.2	2.4	9.2	8.3	49.8	1.5%
Croydon town centre	1.5	2.7	4.8	5.3	8.0	0.9	1.3	1.0	0.0	0.0	0.0	2.5	27.9	0.8%
Redhill town centre	1.0	0.0	0.0	0.8	2.7	22.1	1.1	0.0	0.3	0.0	0.0	0.0	28.1	0.8%
Crawley town centre	0.3	0.0	0.0	0.0	0.8	6.0	1.6	0.0	0.4	0.0	1.4	0.0	10.5	0.3%
Out-of-centre / retail warehousing														
Purley Way retail warehousing, Croydon	20.6	19.4	86.2	16.0	18.9	5.4	8.2	4.4	6.1	2.9	2.6	27.9	218.7	6.6%
New Malden retail warehousing	31.0	33.8	22.3	2.2	0.9	0.2	1.3	4.5	1.8	38.7	16.6	125.0	278.4	8.4%
Other	12.2	24.9	65.4	6.2	18.7	17.9	7.1	12.1	26.8	9.7	27.7	117.7	346.4	10.4%
Sub-total, comparison goods floorspace outside survey area (C)	**164.3**	**188.1**	**231.5**	**49.3**	**61.2**	**62.5**	**47.7**	**60.2**	**119.8**	**169.9**	**177.3**	**562.2**	**1,894.0**	**57.0%**
Local / other shops in survey area (D)	1.9	5.0	1.1	0.6	1.6	1.0	0.1	0.0	0.5	2.4	0.2	1.5	15.8	0.5%
Overall total (A+B+C+D)	**420.4**	**421.2**	**532.3**	**128.1**	**106.3**	**115.8**	**121.4**	**159.4**	**200.9**	**218.7**	**214.7**	**684.7**	**3,323.9**	**100.0%**

Source: Table 3, Table 4. 2017 prices.

Table 6 - Schedule of comparison goods floorspace

In-centre floorspace	Comparison goods floorspace (sq.m net)
Epsom town centre	
Comparison goods retail units	20,896
Comparison goods floorspace at upper floors	5,737
Non-food floorspace in supermarkets	221
Sub-total for Epsom town centre	*26,854*
Ewell district centre	
Comparison goods retail units	1,530
Non-food floorspace in supermarkets	24
Sub-total for Ewell district centre	*1,554*
Stoneleigh district centre	
Comparison goods retail units	1,710
Non-food floorspace in supermarkets	26
Sub-total for Stoneleigh district centre	*1,736*
Local centres	
Non-food floorspace in supermarkets	276
Total in-centre floorspace	**30,420**
Edge/Out-of-centre floorspace	**Comparison goods floorspace (sq.m net)**
Majestic Wine, East Street, Epsom	223
Wickes, Kiln Lane, Epsom	2,519
Halfords, Kiln Lane, Epsom	743
Sainsbury's, Kiln Lane, Epsom (non-food floorspace, inc. Argos and Habitat concessions)	1,532
Other	32
Total edge/out-of-centre floorspace	**5,049**
Overall total	**35,469**

Source: Experian Goad Category Reports / Goad Plans.

Table 7 - Commitments for new comparison goods floorspace

Scheme name	Application ref	Proposed floorspace	Proposed floorspace (sq.m net)	Estimated comparison A1 floorspace (%)	Estimated comparison A1 floorspace (net sq.m)	Turnover per sq.m	Estimated turnover 2019	Estimated turnover 2022	Estimated turnover 2027	Estimated turnover 2032	See note
Lidl, Upper High Street, Epsom	17/00001/FUL	-	1,427	20%	285	2,500	0.7	0.8	0.9	1.0	1
Total	-	-	-	-	-	-	**0.7**	**0.8**	**0.9**	**1.0**	

Notes to turnover assumptions

1 - Based on assumed company average sales floorspace split of 80% convenience / 20% comparison

Table 8a - Epsom town centre floorspace capacity

	2019	2022	2027	2032
Total Available Expenditure (£m)	2,056.7	2,275.6	2,746.8	3,323.9
Market Share from Survey Area (%)	11	11	11	11
Comparison goods spending in Epsom town centre (£m)	216.9	240.3	291.0	353.0
Total comparison goods spending (£m)	**216.9**	**240.3**	**291.0**	**353.0**
Existing Retail Floorspace (sq.m net)	26,854	26,854	26,854	26,854
Sales per sqm net (£)	8,077	8,689	9,879	11,068
Sales from Existing Floorspace (£m)	216.9	233.3	265.3	297.2
Sales from Committed Floorspace (£m)	0.0	0.8	0.9	1.0
Residual Spending to support new floorspace (£000)	0.0	6.2	24.8	54.8
Sales per sq m net in new shops (£)*	8,000	8,607	9,785	10,963
Capacity for new floorspace (sqm net)	**0**	**719**	**2,532**	**4,995**
Capacity for new floorspace (sq.m net, rounded)	**0**	**700**	**2,500**	**5,000**

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REVISED LOCAL PLAN PROGRAMME

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annexe 1: Draft Local Plan Programme (January 2020)
Other available papers (not attached):	

Report summary

A revised Local Plan Programme has been prepared to set the process and timetable for the new Epsom & Ewell Local Plan.

Recommendation (s)

The Committee considers and approves the draft Local Plan Programme January 2020.

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

1.1 The delivery and implementation of the Epsom & Ewell Local Plan contributes towards all of the Council's Key Priorities. The new Epsom & Ewell Local Plan is critical because it will set out how sustainable growth, particularly in relation to new housing, will be delivered during the forthcoming plan period.

2 Background

2.1 The purpose of the Local Plan Programme is to set out the processes and timetable for the preparation and production of the Borough Council's Local Plan. Typically the Council's Programmes have set out a rolling three-year project plan - that seeks to inform both the process and all of the interested parties and partners about how and when the Local Plan will be brought forward.

2.2 Progress against the milestones identified in the Programme is monitored through our Local Plan Annual Monitoring Report. In the past we have amended and revised our Local Plan programme to take account of circumstances that have brought about a change in our plans. Previous Local Plan Programmes have typically been reviewed after being in place for two years or so. Revisions have normally been triggered by changes in national planning policies, such as the revocation of regional plans and the publication of the National Planning Policy Framework (NPPF); and consequential changes in our approach to plan-making.

2.3 Our last Local Plan Programme was published during June 2019. It was our tenth Programme since the adoption of the Core Strategy in 2007. That Programme identified milestones that would have seen further public consultation under Regulation 18 over the Autumn and Winter 2019/ 2020.

2.4 However timescales have slipped. This is primarily due to requests from our local communities requesting that we give further consideration to the nature of future growth. This resulting in the adoption of the Six Principles setting the strategic direction for the new Local Plan. In response we have prepared a new draft Local Plan Programme. We are confident that the new draft Programme will help us meet our ambitions. The draft programme is included at Annexe 1.

3 Local Plan Programme

3.1 The draft Local Plan Programme January 2020 sets out a timetable for the preparation, production and consultation of the new Plan and associated supporting evidence. The timetable identifies key milestones during document production. We will use these milestones to monitor the performance of our Programme.

3.2 The proposed timetable builds upon the last Programme (June 2019). Progress on the background tasks required to implement public consultation under Regulation 18 has continued during the period of delay. Nevertheless, the proposed revised Programme will require our focus in order to meet the timetable. Particularly during Spring 2020 when we envisage making progress towards the Regulation 18 Consultation – which will effectively be a consultation on a draft Local Plan – comprised of a comprehensive suite of strategic, general and site allocation policies.

3.3 In order to be successful we will need to manage the process and our resources (both internal and external) carefully. The adoption and delivery of this timetable will provide the government with a degree of confidence that we are responding positively to the challenges of growth. Critically it ensures that we set the Borough's housing strategy and associated site allocations to meet our objectively assessed needs in full.

3.4 The key milestones over the next twelve months are:

- Spring 2020 - Final Issues & Options Consultation (Regulation 18 Part 2)
- Summer 2021 – Pre-Submission Public Consultation
- Autumn 2021 – Submission to the Secretary of State
- Winter 2021 - Public Hearing
- Autumn 2022 – Estimated date of Adoption

3.5 Member engagement will form a key part of the process mapped out by the key milestones identified above. Both consultation documents will be the subject of reports coming before the Licensing & Planning Policy Committee, as will the decision to progress to submission to the Secretary of State.

4 Financial and Manpower Implications

4.1 The preparation and production of our new Local Plan involves the Planning Policy team and various consultants engaged to assist with the production of the evidence base. Wider teams across the Council, including legal services, procurement and communications are key to assisting with the various elements of the work programme. Contributions from these sources will be particularly valuable during the public consultation and Duty-to- Cooperate stages of the process, when their input can be optimised.

4.2 ***Chief Finance Officer's comments:***

5 Legal Implications (including implications for matters relating to equality)

5.1 None arising from the contents of this report.

5.2 ***Monitoring Officer's comments: none arising from the contents of this report.***

6 Sustainability Policy and Community Safety Implications

6.1 The new Local Plan will contribute towards delivering our objectives for maintaining and enhancing the Borough as a sustainable place to live, work and visit by providing guidance to new development proposals.

6.2 A Sustainability Appraisal of the policy options will form an integral part of the plan-making process. The Sustainability Appraisal Report will be subject to public consultation at an appropriate point in the process.

6.3 The Local Plan has a key role in implementing a number of key objectives that are set out in our Climate Change Action Plan.

7 Partnerships

7.1 The Licensing & Planning Policy Committee considered and agreed a Duty to Co-operate Engagement Plan during November 2018, which seeks to build relationships with neighbours with the objective of securing agreed statements of common ground. The Committee will receive information on progress with the Duty at appropriate points in the process.

8 Risk Assessment

8.1 In the absence of an up-to-date Local Plan we face a number of risk areas. These include the continued absence of a 5 year housing land supply; the additional measures introduced through the outputs of the Housing Delivery Test; and the absence of strategic co-operation with neighbouring planning authorities. Should we fail to respond to these factors we could face direct intervention by the Secretary of State.

8.2 Having an up-to-date Local Plan Programme is a key measure in mitigating the possible risk of direct government intervention. The government encourages local planning authorities to up-date their Local Plan Programmes as often as necessary.

8.3 Recent experiences have demonstrated that progressing the Local Plan process is susceptible to unanticipated impacts that are outside of our control. When unforeseen matters arise we will need to respond clearly, quickly and decisively. We will need to ensure that all of our partners and interested parties (in the Local Plan) have clear understanding of actions and why we have taken them. We will need to ensure that communicate the impact of such actions on our timetable in a timely manner.

8.4 The other notable risk to our Local Plan Programme is the retention of experienced staff, and the recruitment of their replacements. With one of our planning policy officers leaving the authority we need to undertake a recruitment process which may prove challenging.

9 Conclusion and Recommendations

9.1 The Committee are asked to consider the draft Local Plan Programme and subject to any additions or amendments, the Programme will be published and implemented immediately.

Ward(s) affected: (All Wards);

EPSOM & EWELL BOROUGH COUNCIL

Epsom & Ewell Local Plan Programme









Epsom & Ewell Borough Council

January 2020

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1. Introduction

The form and content of the Local Plan Programme

1.1 The Local Plan Programme sets out a rolling project scheme for the production of the new Epsom & Ewell Local Plan. It identifies a timetable for the preparation and production of the new Local Plan that serves as a framework for monitoring and managing progress. The Programme identifies and allocates proportionate resources necessary to achieve our targets; and possible risks and constraints.

1.2 The Programme is designed to provide a rolling three-year project plan - that informs the process and all of the interested parties and partners[1] about how and when the Local Plan will be brought forward. We periodically review and revise the Programme in response to circumstances necessitating a change in our plans.

1.3 Previous Local Plan Programmes and Development Schemes have typically been reviewed after being in place for two years or so. Revisions have normally been triggered by significant changes in national planning policies, such as the revocation of regional plans and the publication of the NPPF; and consequential changes in our approach to plan-making. Our progress against the milestones in the Programme is monitored each year in the Annual Monitoring Report (AMR).

1.4 In accordance with good project management practise we continue to monitor and review the Local Plan Programme annually and update it accordingly. It is this monitoring process that has triggered this current review of the Programme.

The current statutory Development Plan for the Borough

1.5 The Development Plan for the Borough is comprised of the following documents:

The Local Plan

- Epsom & Ewell Core Strategy 2007
- Plan E Epsom Town Centre Area Action Plan 2011
- Epsom & Ewell Development Management Policies Document 2015
- Upper High Street, Depot Road and Church Street Development Brief 2012
- Revised Developer Contributions Supplementary Planning Document 2014
- Parking Standards for Residential Development 2015
- Revised Sustainable Design Supplementary Planning Document 2016

Surrey-wide Documents

- Surrey Waste Plan 2008
- Surrey Minerals Plan Core Strategy 2011

[1] Our partners in this process may include neighbouring local planning authorities, more distant authorities that either have or will in the future have an interaction with our housing market area, the County Council and strategic infrastructure providers.

1.6 In addition to the above documents we have also prepared and produced a number of useful and valued supplementary planning guidance documents. These amplify the policies and proposals of the Local Plan. Such additional local guidance is considered necessary and for that reason is believed to be consistent with national planning policy. The main role of these documents is to clarify and support local policy and it may be taken into account as a material consideration in relation to the determination of planning applications. These include the following documents:

- Single plot and other types of residential infill development 2003
- Householder Applications 2004
- Solar Panel Guidance for Domestic Installation 2011
- Biodiversity and Planning in Epsom & Ewell 2012
- Shopfront Design Guide 2012

1.7 In parallel to our new Local Plan we are preparing a Masterplan for Epsom & Ewell that will explore how the Borough could positively transform to respond to the significantly higher scale of housing demand calculated through the government's standard method and Housing Delivery Test. It will initially sit alongside our emerging Local Plan – providing supporting evidence and information during the examination in public process. It is possible that following the adoption of our new Local Plan that it could provide a supplementary planning framework that will contribute towards the sustained transformation of the Borough into the 2040s.

2. The new Epsom & Ewell Local Plan

Proposed Content

2.1 We anticipate that the new Epsom & Ewell Local Plan will include the following policy components:

- A Borough-wide growth strategy that brings together how we will positively plan for growth across all of our land uses – including new housing, employment, retail, green infrastructure, sustainable travel and other essential infrastructure networks. The emerging strategy will also incorporate six key principles that have been identified as being essential for securing sustainable growth;
- An appropriate housing strategy that responds to the government's assessment of objectively assessed housing need[2];
- Revision of the Borough wide housing target to take account of objectively assessed housing need[3]; taking account of the relevant constraints affecting the ability of the development industry to deliver the scale of housing during the plan period;
- An overview of how the Borough Council will work with its housing market area partners and others to address unmet need[4];
- A Strategic review of the Green Belt[5];
- A review of our affordable housing delivery policy[6];
- New policies setting out our approach towards heritage assets – specifically in relation to the identification and designation of locally listed buildings and structures;
- A new spatial economic development strategy, which encompasses the continued evolution of Epsom Town Centre and the Borough's other retail centres;
- An appropriate infrastructure strategy that responds and complements the scale of new housing identified by the government's objectively assessed housing need calculation. This will seek to bridge the gaps in capacity and funding that currently serve to constrain the necessary scale of new housing delivery required to meet the government's assessment of need[7].

2.2 We also anticipate that the new Local Plan will include new site allocation policies relating to:

- Green Infrastructure[8]

[2] As set out in Core Strategy Policy CS8, which currently states that new housing will be located within the defined built up area and within the then remaining Hospital Cluster development sites, which have subsequently been largely built-out.
[3] As currently set out in Core Strategy Policy CS7.
[4] It is anticipated that this will take the form of a separate strategy or agreement siting outside of the Local Plan
[5] As currently set out in Core Strategy Policy CS2.
[6] As currently contained within Core Strategy Policy CS9
[7] A new policy that will replace the approaches set out under Core Strategy Policies CS12 and CS16.
[8] Green Infrastructure is a term we use to describe a wide variety of assets that among other things contribute to our local biodiversity, our visual character and appearance, help to mitigate the adverse impacts of climate change and provide vital open space for our residents and those of adjoining areas.

- Housing delivery
- Employment sites
- Retail centres
- Education infrastructure
- Sustainable transport networks

2.3 Some of these policies and site allocations were originally intended for inclusion within the Site Allocations Document[9], which was subject to pre-submission public consultation during 2015/ 2016. It is anticipated that the draft policies and site allocations that formed part of that earlier process, and which remain sound and relevant, will be brought forward through the new Local Plan.

Coverage

2.4 The document covers the whole of the Borough. To date the Local Plan period has been identified as starting during 2015 and ending during 2032. This period was derived from the Kingston and North East Surrey Strategic Housing Market Assessment (June 2016), which provided an initial calculation of the Borough's objectively assessed housing need (in advance of the standard methodology). That document used 2015 as the baseline date for calculating objectively assessed housing needs. The Local Plan period has been reset to start at 2017, which is the baseline date for the government's standard methodology; which identifies a Local Plan period end date during 2034.

Conformity

2.5 The new Local Plan will be in conformity with the NPPF. It will set out the scale of local housing need and the broad areas and the specific sites across the Borough that will be brought forward to deliver future housing. It will also set out our approach to meeting local affordable housing need through the development process.

[9] That document comprised non-housing site allocations.

Timetable

2.6 The review of the Local Plan Programme has introduced an additional Regulation 18 Consultation, which seeks to build-upon earlier consultation conducted during 2017. The proposed scope of the Regulation 18 Part 2 consultation will be focussed on confirming a Borough-wide growth strategy; an appropriate housing strategy; and the specific sites required to deliver its outcomes. The Final Issues & Options Consultation will also consider other aspects of growth – including economic development, retail, infrastructure provision and ensuring that our future growth is embedded with quality. At the conclusion of the proposed consultation period, we anticipate that the process will move towards the pre-submission stage.

Key Stages	*Dates*
Issues & Options and Call for Sites Consultations (Regulation 18 Part 1)	September – December 2017
Consideration of Consultation Responses	December 2017 – March 2018
Preparation and Production of the Masterplan for Epsom & Ewell	June 2018 – June 2019
Preparation of the Epsom & Ewell Duty to Co-operate Engagement Plan	September – October 2018
Final Issues & Options Consultation (Regulation 18 Part 2)	May - June 2020
Pre-Submission Public Consultation	June - August 2021
Date of Submission to Secretary of State	October 2021
Pre-Examination Meeting	December 2021
Public Hearing	January 2022
Estimated Date for Adoption	December 2022

Arrangement for Production

Organisational Lead
Planning Policy Manager

Political Management

2.7 The review process will be managed by our Licensing & Planning Policy Committee, who are responsible for approving draft policy options for public consultation and the subsequent Pre-submission stages.

2.8 Full Council approval will be required for the final adoption stage.

Internal Resources

Planning Policy Manager x 1 FTE
Senior Planning Policy Officer x 1 FTE
Planning Policy Officers x 0.89 FTE
Planning Policy Administrator x 0.77 FTE

Other resources as required – likely to be deployed from within the wider Planning Department, and as necessary from across the organisation.

External Resources

2.9 Consultants are engaged in the production of the necessary technical evidence base documents. External expertise has already been deployed in relation to the calculation of the initial 'objectively assessed housing need' and in preparing an assessment of the Borough's Green Belt; both being required under national planning policy. Internal knowledge and other resources will be deployed in order to optimise the value of external resources. Further studies will be produced, either in-house or by external consultants, as necessary.

Stakeholder Resources

2.10 We will work closely with neighbouring planning authorities and other strategic partners who have a tangible functioning relationship with the Borough to discharge our duty to co-operate. In a scenario where our Housing Strategy clearly and robustly demonstrates that it will not be possible to deliver our objectively assessed housing need in full during the plan period (potentially because of insufficient housing land supply or infrastructure capacity) we will work with our neighbours and other strategic partners to identify solutions as to how this could be addressed across a wider area. It is anticipated that this will form a critical part of the new Local Plan and will require the deployment of relevant resources from across the organisation.

2.11 We will work closely with local partners to ensure that the emerging policies contribute positively to meeting our strategic objectives. Specifically we will seek to ensure that future community infrastructure needs are taken into account during the preparation of new policies.

2.12 We will work closely and positively with landowners and the development industry to deliver the appropriate housing strategy that will be identified by the new Local Plan. Whilst we, as the local planning authority, carry the responsibility for securing housing delivery in response to the challenge of the government's objectively assessed housing need calculation, the industry is expected to shoulder some of this burden. In particular, we will require the industry to positively respond to the scale of growth in timely manner (during the plan period).

2.13 We will engage directly with key local community groups, local political party groupings and other local interest groups, such as the Epsom Civic Society and the Campaign to Protect Rural England. Representatives of stakeholder groups will be invited to attend regular meetings or surgery sessions throughout the process, where they can informally discuss issues and options raised in the consultation.

Community and Stakeholder Involvement

2.14 The local community, specific consultation bodies and key stakeholders, including developers, will be invited to take part in the consultation process, with a view to identifying issues and working up suitable deliverable and developable options that accord with the NPPF.

3. The Evidence Base

3.1 Our new Local Plan is supported and informed by new evidence and a refresh of existing technical studies. This work conforms to national planning policy and guidance. It also takes account of relevant existing technical evidence that is available across north east Surrey and south west London.

Timetable

Documents	**Publication Dates**
Strategic Housing Market Assessment[10]	October 2016
Green Belt Study Stage 1	February 2017
Strategic Housing Land Availability Assessment (SHMA)[11]	July 2017
Traveller Accommodation Assessment	July 2017
Constraints Study	July 2017
Strategic Flood Risk Assessment Update	June 2018
Green Belt Study Stage 2	July 2018
SHMA version 2	September 2019
Draft Masterplan	September - October 2019
Retail Needs Study and Centre health Check	January 2020
Spatial Economic Development Strategy	January 2020
Indoor & Outdoor Sports Facilities Assessment and Playing Pitch Strategy	April 2020
Strategic Viability Assessment	April 2020
Habitats Regulations Assessment	April 2020
Open Space Audit Review	June 2020

3.2 The preparation and production of the above technical studies will include proportionate and necessary stakeholder engagement. This is most likely to relate to the methodology used by the technical study in question, rather than the outputs or conclusions. Any party who wishes to challenge the outputs from these technical studies may do so through the Local Plan process, where they have an opportunity to present alternative evidence.

[10] Originally prepared in partnership with Royal Borough of Kingston, Elmbridge and Mole Valley Borough Councils.
[11] Previous Local Plan Programmes have referred to Strategic Housing and Employment Land assessments. We already undertaken significant work on establishing our future employment needs into the future, so a joint study is no longer considered necessary.

4. Supporting Statement

Monitoring

4.1 Monitoring continues to be an important part of the planning-making process and will help gauge the effectiveness of policies and proposals. We will monitor a range of indicators to assess whether the policies and proposals are meeting the objectives set out in our Local Plan. The key findings will be published in the Annual Monitoring Report (AMR). The most recent, and previous AMRs are available to view on the Borough Council's website. The Local Plan AMR is normally the subject of a report to the Council's Licensing & Planning Policy Committee, following which it is published on the Council's website.

Reviewing the Programme

4.2 We will continuously monitor progress on the implementation of the Local Plan Programme. Progress will be monitored against the proposed timetable for our new Local Plan. Where milestones have not been reached, we will consider appropriate actions to ensure that positive momentum is maintained. When appropriate we will amend the Programme.

Strategic Environmental Assessments & Sustainability Appraisals

4.3 Strategic Environmental Assessments of policies, proposals and plans are required under the European Strategic Environmental Assessment Directive 2001/42/EC. These are required for plans and proposals that are likely to have significant effect on the environment. The on-going Brexit process has not had an impact on the requirement to meet the Directive during the life of this Programme. It is anticipated that the requirements of the Directive will be maintained and incorporated into British law when the United Kingdom leaves the European Union.

4.4 Sustainability Appraisals differ in that they are a social, economic and environmental assessment. We believe it is important to take an integrated approach towards both the Strategic Environmental Assessment and Sustainability Appraisal and to consider the implications and alternatives at an early stage. This will ensure that our Local Plan documents reflect sustainable development objectives. The requirements of a Strategic Environmental Assessment will be incorporated into the Sustainability Appraisal, which will be undertaken on the emerging policies when bringing forward our new Local Plan.

Resources

4.5 In the past funding from the Housing Planning Delivery Grant was allocated to assist in the plan making process. This has helped fund external expertise to undertake specialist work on technical papers. It has been proposed that remaining Housing Planning Delivery Grant monies and other sources of funding will be used to finance future work.

4.6 Staffing resources for the timely production of the Local Plan remain a critical issue (see Risk Management section below). At present, the following in-house resources can be drawn upon during the period covered by the Programme:

- Planning Policy Manager x1
- Senior Planning Policy Officer x1
- Planning Policy Officers x 0.88 FTE[12]
- Planning Policy Administrator x 0.77 FTE
- Other occasional staff resources to be deployed either from with the Planning Service or from other corporate services as required

4.7 We will continue to use external sources of expertise where appropriate, such as on specialist topics or where there is no existing capacity. It is anticipated that Surrey County Council will continue to provide assistance with transport, education and other infrastructure capacity matters. Additionally the Planning Policy Team continues to promote joint working initiatives, whenever these are practicable and relevant, with the other Local Authorities in East Surrey to help bridge the potential staff resource gap. This has worked in the preparation of technical evidence.

4.8 Members are kept informed of progress on the Local Plan primarily through Licensing & Planning Policy Committee meetings. Throughout the Local Plan process we will continue to run special evening sessions/ workshops for Members. These will impart additional information and opportunities for Members to feed-in their comments into the plan making process. The outputs of the sessions/ workshops will be reported to the Licensing & Planning Policy Committee.

Joint Working – The Duty to Co-operate

4.9 There are no proposals to set up a joint planning board with neighbouring authorities. Whilst such initiatives may provide value to the process elsewhere, there is no evidence to suggest that a joint planning board is required in northeast Surrey.

4.10 Nevertheless, we continue to work with other Surrey Districts and with Surrey County Council on sharing best practice, undertaking Sustainability Appraisals and where appropriate undertaking other initiatives. We have also been actively involved in joint projects with neighbouring authorities on subjects such as establishing a methodology for preparing Traveller Accommodation Assessments, preparing Strategic Housing Market Assessments, and managing flood risk (specifically in relation to the Hogsmill River). We continue to work effectively with colleagues across Surrey on strategic infrastructure planning.

4.11 We continue to explore meaningful mechanisms by which we can discharge our Duty to Co-operate with neighbouring local planning authorities and other key partners. We are already working closely with our immediate neighbours in the East Surrey local authorities, and have a positive relationship with

[12] There are current two post holders in part time roles that collectively comprise a single 4/5 full time post.

Surrey County Council and the wider Surrey local authorities. We believe that we can build upon these existing relationships to achieve a broad consensus on future plan making. We will explore the opportunities that may be available to meet the objectives of the Duty to Co-operate through our membership of the Coast to Capital Local Enterprise Partnership and Gatwick Diamond groups.

4.12 Many of the Surrey local planning authorities are signatories to the County-wide Local Strategic Statement. This document provides a framework for discussing, considering and potentially reaching an agreed position on strategic planning matters. It is anticipated that this will soon be expanded to include planning for infrastructure, housing growth and consideration of Green Belt related issues.

4.13 Our relationship with the Greater London Authority and the London boroughs that neighbour us to the north and northwest, have historically been less developed. We are forging new relationships with our neighbours to the north through continued active involvement in the London Plan process. The first stage of the Duty to Co-operate process[13] has developed our strategic planning relationship with our immediate neighbours in Greater London. This will be evidenced in detail in the Duty to Co-Operate Position Statement, which we anticipate publishing at the Regulation 18 Part 2 stage of the process.

4.14 However, we highlight that the differences in national planning policy relating to London actively serve to distance us from our colleagues in London. Indeed, the strategic status of the London Plan could be interpreted as a dis-incentive to positive co-operation. As a consequence, whilst we may strive for a positive relationship with our neighbours to the north, the desire for fruitful co-operation may not be fully reciprocated. This continues to be an area of significant risk that lies beyond our ability to influence.

4.15 Finally, recent local examination reports are forcing us to reconsider how we respond to specific strategic issues through the Duty. It is becoming clear that the Duty, and how it is discharged, continues to evolve. Previous approaches to discharging the Duty no longer appear to have currency with Local Plan Inspectors – who now appear to require that neighbouring authorities prepare and adopt agreed strategies to address key issues. In particular we anticipate that we will be required to demonstrate how we will work collectively with our neighbours (including within our housing market area) to address unmet housing need. We will seek to meet this possibility.

Project Management

4.16 The new Local Plan is a corporate priority for the Borough Council. Consequently the Local Plan Programme is an important project management document. Progress on the Local Plan will be reported regularly to the Chief Executive, Committee Chairmen and the Borough Council's Leadership Team.

[13] The Borough Council's Licensing and Planning Policy Committee considered a Duty to Co-operate Engagement Plan on 15 November 2018. This noted that initial meetings, starting from Autumn 2018, with the Royal Borough of Kingston; Elmbridge; Mole Valley; the Greater London Authority; the London Borough of Sutton and Reigate & Banstead would identify and confirm the strategic issues relevant to that discussion.

Council Procedures

4.17 For matters relating to the new Local Plan, the following reporting protocols will apply:

- Licensing and Planning Policy Committee will be responsible for the preparation, production and completion of all local plan documents; and
- Full Council will be responsible for the formal adoption of all local plan documents following consultation and examination.

Risk Management

4.18 The main areas of risk are considered to be:

- **Legal Challenge:** We will ensure that Local Plan documents are sound, positively prepared, justified, effective and consistent with national planning policy. However, on the basis of recent developments elsewhere in Surrey there is a risk, particularly post-examination, that our new Local Plan becomes the subject of legal challenge; such as a judicial review.

- **Staff Retention and Turnover:** This continues to be an area of significant risk to the Local Plan process. The loss of experienced members of staff continues to be an issue. Nationally, there is a shortage of experienced planning policy Officers. This position is particularly acute in relation to Officers at management and senior level. There are a diminishing number of Officers with local plan inquiry or examination experience – in respect of preparing and presenting evidence to the Inspector. We remain mindful that any loss of our experienced planning policy staff will have an impact on our ability to meet our Local Plan Programme.

- **Changes in government:** The short lifespan of our previous Local Plan Programme serves to remind us of unanticipated and extraordinary areas of risk. The currently fluid nature of national politics is an area of risk. The continued rise of populism could result in reactionary measures that impact upon our plan-making process. By its nature this area of risk is unpredictable.

- **Changes in national Legislation:** It is important that we maintain forward momentum and prepare our new Local Plan in accordance with national policy. However, amendments to national planning policy may necessitate a change of direction. This has been evidenced by recent introduction of the government's standard methodology and Housing Delivery Test – both of which alter the scale of objectively assessed housing need calculated for the Borough. Given the significant differences between our calculation (as set out in our SHMA) and the government's assessment an impact on the timetable was inevitable. It is conceivable that there will be further changes in national planning policy of this magnitude during the new Local Plan period. We will seek to minimise any collateral impacts by consulting with Members on possible solutions, which may include revisiting the Local Plan Programme.

- **Availability of Planning Inspectors:** Early notification of our new Local Plan Programme will forewarn the Planning Inspectorate of our anticipated timetable. The Programme will be passed to the Planning Inspectorate to aid their project management of future examinations. The Inspectorate will then enter into Service Level Agreements with us to ensure that they make adequate resources available for future stages of the process. This will help minimise the risk of delays to adoption dates.

- **High Levels of Response to Public Consultation Stages:** Experience from elsewhere in Surrey has shown that this can have an impact on the Programme timetable – due to the number of responses involved. We will seek to manage this risk by ensuring that an appropriate level of resource can be deployed to manage significant number of responses. Other areas of risk associated with this issue are difficult to predict and manage. We will seek to address some of these areas by adopting a clear communication strategy, which will seek to set out the challenges that the Borough Council faces.

- **A wildly evolving Duty to co-operate:** The absence of firm guidance and regulation relating to the Duty has always made it an aspect of the process where risk thrives. In the past an exchange of anodyne communications between authorities has proved sufficient to placate Inspectors. This is no longer the case – recent decisions suggest that Inspectors are seeking greater certainty that local planning authorities are genuinely working together to address strategic issues. We believe that this constitutes sound planning and consequently we will rise to this challenge. However, in the continued absence of guidance and regulation risk remains as the Duty may evolve in new and unexpected directions. Our proximity to greater London and the entirely different strategic regime that functions there suggests that risk from that area is high. We will continue to monitor and engage in the development of local plans in both the London Borough of Sutton and the Royal Borough of Kingston. We will try to understand and accommodate the developments in the Duty that spring from those processes. We will continue to seek to work with our partners in London – trying to establish and maintain the best relationship possible under these circumstances.

- **Unsettled economic climate:** There is a risk that the period following Brexit will result in unpredictable changes in national planning policy, particularly if the government chooses to pursue an entirely new agenda. This may happen in response to the unsettled economic conditions following Brexit. Consequently, we may need to prepare new evidence and re-draft policy alongside any developments in this area. This will have an impact upon the proposed timetable. Given the unknown nature of this risk there is little that we can introduce as mitigation.

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