

Conserving and Enhancing the Quality of the Built Environment

3.6 *Background*

- 3.6.1 The built environment is instrumental in defining the character of the local area. The Borough's rich built heritage is of considerable interest to the local community, and is greatly valued. The attractive and varied character of the built up areas, and the relationships between them and the surrounding open countryside, contribute significantly towards the quality of life, and should be conserved and enhanced.
- 3.6.2 Both Government policy and that of the South East Plan seek a renaissance of urban areas, both because of the wider benefits and to make them places where people choose to live. While urban renaissance is a wide-ranging concept, protecting and improving the quality of the natural and built environment is a vision shared by the Council's Corporate Plan and the Borough's Community Strategy. This objective may be achieved not only by offering protection to historical assets, and ensuring harm to the environment is minimised, but also by ensuring that the design and layout of new developments are in harmony with, and positively contribute to, local character and its context. This principle will extend across the potential design range, from major sites to smaller-scale domestic extensions.
- 3.6.3 As new developments will have a long life-span it is important they embrace the concept of sustainability - socially, economically and environmentally - and are a long-term asset to the community. Good design is becoming increasingly important as more opportunities are taken to intensify development within the built up areas. Achieving a balance between the competing pressures of increasing density, choosing the appropriate scale and height of building, and safeguarding local character, is an important challenge to which good design plays a vital role.

3.7 *The Built Environment*

- 3.7.1 Epsom and Ewell possesses a fine built heritage which is held in high regard by the Borough's residents. This has been recognised by the designation of 21 conservation areas, each different in form and character, but all designated for their special architectural or historic interest. Additionally, the Borough contains over 400 'listed buildings' and some 100 'locally listed' buildings, all of which add to the variety and richness of the urban environment. The majority of these individual buildings fall within designated Conservation Areas and, as they are limited in number, it is important they are preserved and protected from inappropriate development.
- 3.7.2 Support was given in the 'Preferred Options' paper for the continued protection of such areas and buildings, although the importance of an emphasis on enhancement as well as preservation was recognised. New development, carefully integrated with the old, can help achieve this. It is an objective of the Core Strategy to seek to protect and enhance conservation areas and listed buildings, including their settings. The value of the special character of some established residential neighbourhoods has been recognised locally and the Site Allocations DPD will consider whether other areas of special character should also be defined.
- 3.7.3 The Council has begun to prepare character appraisals and management plans for each of

the Borough's conservation areas. These will assess the character of each area, defining what contributes to making them "special". They will identify both positive and negative features of the environment, and will define elements which should be improved. Up to date appraisals will form a vital source of detailed information for later local development documents, particularly the Area Action Plan for Epsom town centre.

- 3.7.4 It is also desirable to provide for the protection and care of finite archaeological remains, especially those of national importance. The Borough contains two Scheduled Ancient Monuments - the site of Nonsuch Palace and its associated remains, and St Mary's Church Tower in Ewell. Additionally there is one identified County Site of Archaeological Importance in the Borough - 'Diana's Dyke', a site close to Nonsuch Palace. In line with Planning Policy Guidance 16: Archaeology and Planning, the Council will promote the protection, preservation and enhancement of sites of archaeological interest and of their setting. A positive approach will be taken when facilitating new development in areas of high archaeological potential, with appropriate protection provided to future discoveries of archaeological interest.
- 3.7.5 Good design is a key part of sustainable development. The Council wants to help create places where people choose to live, work and visit. It wishes to protect and enhance the pleasant scale, character and amenities of the developed areas of the Borough. New development should enhance and complement local character, and be capable of integrating well into existing neighbourhoods. For example the built up areas of the Borough have a characteristically "leafy" appearance, which provides a distinctive natural element in the urban environment. It is important that new development helps to maintain and enhance this aspect through the incorporation of appropriate green amenity space and landscaping.
- 3.7.6 The Council will expect developments to be of a high quality, creating a safe environment which enhances the public realm and which positively contributes to the townscape. Inclusive design results in environments that are accessible and convenient for all people, regardless of disability, age or gender. The "Surrey Design Guide", produced in collaboration between the Surrey District Councils, is a useful tool in helping to maintain and improve the quality of the urban environment and is commended.
- 3.7.7 Although Epsom and Ewell Borough has low levels of crime and is perceived to be a safe place in which to live, there remain concerns about crime levels, and the impact of antisocial behaviour. Reducing crime and the fear of crime remains a priority of the Community Safety Strategy and is reflected in the Community Strategy's aspirations for a "safe society". Careful planning and good design of new developments can make a contribution towards this objective; positively influencing human behaviour and helping people feel safe in their environment. The Council will expect new developments to consider 'designing out crime' principles from the outset, for example covering the layout, features and lighting of a development. Making security an inherent part of the design process during the early stages is imperative, as once a development is built, the main opportunity for crime prevention measures has been lost.

Policy CS 5

The Council will protect and seek to enhance the Borough's heritage assets including historic buildings, conservation areas, archaeological remains, ancient monuments, parks and gardens of historic interest, and other areas of special character.

The settings of these assets will be protected and enhanced.

High quality and inclusive design will be required for all developments. Development should:

- **create attractive, functional and safe public and private environments;**
- **reinforce local distinctiveness and complement the attractive characteristics of the Borough;**
- **make efficient use of land and have regard to the need to develop land in a comprehensive way.**

3.7.8 The Council is preparing conservation area appraisals and management plans for each of the Borough's conservation areas. Detailed policies relating to development within and adjacent to conservation areas, and to development affecting listed buildings and sites of archaeological interest, will be contained in the Development Control Policies DPD. The Council will prepare further guidance on design such as design briefs and design statements to help create better environments. These will be published as Supplementary Planning Documents.

Indicators

- Percentage of conservation areas where appraisals and management plans have been completed
- Number of listed buildings within the Borough on the national 'Buildings at Risk Register'
- Number of "locally listed" buildings on the Council's local 'Buildings at Risk' register
- Number of potential archaeological sites where development has taken place without investigation
- Regular review of the quality of design in completed new development, in collaboration with other partners

Targets

- Conservation Area appraisals: an increasing proportion until all are completed
- A reduction in the number of buildings on the national 'Buildings at Risk Register'
- A reduction in the number of buildings on the local 'Buildings at Risk Register'
- A method to review the quality of design will be developed in conjunction with the Design Guidance SPD

Delivery Mechanism

- Through development control advice, negotiation and decisions
- Through guidance in SPDs, including development briefs, design statements and design guidance (including the Surrey Design Guide)
- By the preparation and publication of conservation area character appraisals and management plans
- Through designations and policies in other DPDs, including a review of relevant boundaries of protected areas and the identification of other areas of special character
- By engagement with the local community, developers and other agencies involved in securing high quality development.

3.12 *Affordable Housing and meeting Housing Needs*

- 3.12.1 Epsom and Ewell Borough, similar to other areas in the South East, is an area of high housing demand and high levels of owner occupation. As a consequence many first time buyers, some key workers and lower income households find it difficult to gain a foothold in the local housing market.
- 3.12.2 In 2004 the Council adopted as a key priority, “to secure additional key worker, social and affordable housing”. This is reflected in the Community Strategy which lists as a key objective, “Providing affordable housing and improving the recruitment of key workers.” This is seen within the Community Strategy as a way of contributing to its over-arching theme of seeking a caring society and a thriving economic community. The provision of affordable housing is therefore one of the Council’s clear priorities and helping provide the right mix of dwelling sizes and tenures, including affordable housing, is an important function of this plan.
- 3.12.3 For the purposes of this plan and the operation of the Council’s housing strategy, ‘affordable housing’ is that provided with subsidy, either as social rented housing or intermediate affordable housing,, as an on-going resource for people who are unable to resolve their housing requirements in the local private sector housing market because of the relationship between housing costs and incomes. It therefore means housing where the subsidy allows the asking price or rent to be substantially lower than the prevailing market prices or rents in the Borough.
- 3.12.4 The Council commissioned a housing needs survey in 2004 which highlighted the nature and extent of the need for affordable housing in the Borough. This provides the basis for more detailed guidance on the need for dwelling size, type and tenure, and the needs of particular groups in the community. Delivering a better balance between the supply and the demand for housing is an important driver behind policies for affordable housing in this plan. For example the Borough is experiencing a decline in household size which is likely to result in a continuing shift in demand for certain types of dwellings. Regular housing needs surveys will help the Council to remain aware of such needs and adapt the detailed implementation of policies to take these into account.
- 3.12.5 The 2004 survey identified an annual affordable housing shortfall of 518 units. This is some ten times greater than the current delivery level from acquisitions, new units or conversions, resulting in substantial levels of unmet housing need each year. When re-lets are taken into account the net outstanding unmet local housing need is 395 dwellings annually. The provision of this number of units is clearly not deliverable or sustainable in the context of previous and planned future construction rates, and the environmental constraints within the Borough. There is a high level of local need but only limited sites on which affordable housing can be secured. This highlights the importance of delivering the maximum number of affordable dwellings from the new housing development that will take place over the period of the plan.
- 3.12.6 Both the Surrey Structure Plan and the submitted South East Plan contain strategic targets for the provision of affordable housing as a proportion of all new housing completions. Within the London Fringe sub-region overall there is a requirement for 40% of new housing to be affordable. Prior to submission of the South East Plan, and having considered the results of the 2004 Housing Needs Assessment, the Council adopted an overall target to ensure that at least 35% of all new housing completions in Epsom and Ewell Borough are affordable. This equates to the provision of 950 new affordable homes over the period 2007 to 2022

based on total provision set out in Policy CS7. These should comprise a tenure mix of 70% social rented, and 30% intermediate affordable housing. These targets will be kept under review by the Council, and may be changed as a result of: monitoring and future housing market assessments; significant changes in the availability of additional funding; and changes in overall housing provision for the plan period.

- 3.12.7 Past and predicted future patterns of housebuilding suggest that the number of sites likely to come forward for housing in Epsom and Ewell Borough above the national threshold of 15 units and 0.5 hectares is limited. The high level of housing need and the limited overall supply of potential land for housing, therefore justifies the lowest reasonable threshold for securing affordable housing, without inhibiting development or prejudicing the overall supply of new housing. We must also take into account that the sustainability appraisal has raised the issue that applying a threshold for affordable housing contributions may encourage developers to build at lower densities.
- 3.12.8 Because of these circumstances, in order to achieve its overall target, it is the Council's view that it is appropriate and necessary for smaller housing schemes to make a reasonable contribution towards the provision of affordable housing. However because some smaller sites may be less viable than larger sites it is recognised that in adopting a percentage requirement care must be taken not to discourage development from taking place and thereby restricting the supply of housing overall. Policy CS9 sets out a sliding scale of provision based on the number of dwellings proposed.
- 3.12.9 The delivery of the target expressed in Policy CS9 will depend upon some sites being developed for up to 100% affordable homes, including land currently owned by the Borough Council, or under the control of Registered Social Landlords. Encouragement will be given to maximising the potential of land within the urban area of Epsom and Ewell to provide housing which meets affordable housing needs.

Policy CS 9

The Council has a target that overall, 35% of new dwellings should be affordable. This equates to the provision of 950 new affordable homes over the period 2007 to 2022.

New housing developments should include a mix of dwelling types, sizes and tenures which help meet identified local housing needs and contribute to the development of mixed and sustainable communities.

Taking into account the viability of the development proposed and other planning objectives, the Council will negotiate to achieve the provision of affordable housing as set out below:

Residential developments of between five and fourteen dwellings gross (or on sites between 0.15ha and 0.49ha - irrespective of the number of dwellings proposed) should include at least 20% of dwellings as affordable.

Residential development of 15 or more dwellings gross (or on sites of 0.5ha or above) should include at least 40% of dwellings as affordable.

The Council will seek to ensure that the affordable housing remains affordable to successive as well as initial occupiers through the use of planning conditions or a planning obligation.

Advice on the detailed operation of this policy, the definition and nature of the local housing needs to be met, the tariff system to be used, and the mechanisms for delivery of the affordable housing, will be set out in the Developer Contributions SPD.

- 3.12.10 This policy will provide the basis of detailed negotiation with residential developers. In all cases the Council will seek the maximum reasonable amount of affordable housing in negotiating on individual schemes and will have regard to its affordability and tenure-balance targets; the suitability of the site for different types of affordable housing provision; and the economics of site provision, taking into account any abnormal site development costs, the availability of subsidy and any other relevant planning requirements. The 20% and 40% figures in the policy will be regarded as baseline targets and developers will need to demonstrate why the particular targets could not be met in any specific case. The contribution this policy makes to meeting the overall 35% affordable housing target for Epsom and Ewell will be kept under review.
- 3.12.11 Other than in exceptional circumstances the provision of the affordable housing should be made on site. Where there are specific and overriding site constraints, or where development-specific issues inhibit the provision of affordable housing, off site provision or financial contributions may be acceptable. In these instances, the proposal will need to reflect the fact that the facilitating site will be developed for 100% private market housing, and the proportion of affordable housing units sought, or financial contribution offered, calculated accordingly. This may also be required where, following negotiation, the units to be developed do not match the housing needs of those requiring affordable dwellings.
- 3.12.12 In addition to on-site contributions from developers, meeting the overall levels of affordable housing proposed in this plan, and achieving the required balance between social rented and intermediate affordable housing, will depend upon continued financial subsidy from a variety of sources. These sources include the National Affordable Housing Programme (NAHP), via Housing Associations, and contributions from the Council's capital reserves or from landholdings. The level of public funding subsidy required will vary between the different types of affordable housing being provided. It is the Council's intention to deploy negotiated commuted sums where appropriate to top up NAHP funding should this be necessary. The Council considers that based on recent levels of public funding, the affordable housing targets in this plan are achievable. However should there be a significant reduction in the level of funding through the NAHP, the Council may need to reconsider its housing programme and its affordable housing targets. Further information on the level of subsidy funding available for specific affordable housing schemes, and on the current availability of public funding to support the Council's housing programme, will be made generally available in the Developer Contributions and Housing Delivery SPDs, and to individual developers as part of the proposed 'open book' approach to site viability assessment.

Indicators

- Number of affordable housing units completed per annum (and as a % of total net completions)
- Number of social rented and intermediate affordable housing units per annum (and as a % of total affordable housing completions)

Targets

- Number of affordable units is set out in Policy CS9

- The affordable housing tenure mix of 70% social rented and 30% intermediate affordable housing is set out in the supporting text

Delivery Mechanism

- Through the proposed Developer Contributions SPD which will set out the nature and extent of contributions from developers
- Through negotiations between development control and residential developers
- Through the preparation of site development briefs
- By joint liaison and close working with housing agencies including the Council's Housing Department, Registered Social Landlords and housebuilders

3.13 *Gypsies, Travellers and Travelling Showpeople*

- 3.13.1 It is Government policy that local authorities should make adequate provision for gypsies and travellers. Circular 01/2006 requires provision to be made on the basis of the results of local authority Gypsy and Traveller Accommodation Assessments. These joint studies are currently underway in Surrey. When completed they will provide a comprehensive information base relating to the needs and requirements of gypsies and travellers, as well as for travelling showpeople.
- 3.13.2 Indications are that in the South East as a whole there is likely to be a shortage of authorised sites to meet an identifiable unmet need. It is intended that an early partial review of the South East Strategy will provide a strategic view of needs across the region, and will identify the number of pitches required for each local authority area. However in the meantime local authorities are expected to present in their Core Strategy documents, the criteria for the location of gypsy and traveller sites which will guide the allocation of sites in the relevant DPD (in this case the site allocations document). Policy CS10 provides the broad context for any such allocations.
- 3.13.3 The County Council manages gypsy sites at two locations within the Borough which together provide 30 pitches. There is an existing privately owned showpeople's site in the Borough. Until the Gypsy Accommodation Assessments are completed, and information is made available on the scale of unmet needs, there are no specific proposals made in this Core Strategy for additional pitch provision. This position will be reviewed when the results of the surveys are known and the South East Plan has been reviewed. Representative organisations will be consulted at an early stage if there is a need for additional provision.

Policy CS 10

Provision will be made for additional sites for gypsies and travellers and travelling showpeople if a need is identified in the joint accommodation assessments currently being undertaken or in the South East Plan Review. Where additional sites are required they will be allocated in the Site Allocations DPD. The selection of any such site will take into account the policy objectives of the Core Strategy, the needs of future occupiers and the likely availability of any site for its intended occupiers. The Development Control DPD will include a criteria based policy for the consideration of applications on any other sites.

interest as being related to human health, public safety and the beneficial consequences of primary importance for the environment⁶

- 2.19 The Council has adopted a document entitled [“Biodiversity and Planning in Epsom and Ewell”⁷](#) for development management purposes. The guide assists in the process of identifying when and where biodiversity in Epsom and Ewell will need to be protected by the planning system, as well as assisting in identifying opportunities to deliver biodiversity enhancements.

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.

Trees and Landscaping

- 2.20 The abundance of trees in the Borough is a great asset to its environment, softening the hardness of buildings and streets, adding life, colour and character to the urban landscape and enhancing open spaces and the riverside landscape. The Borough’s woodland assets include 14 areas of ancient woodland, which are a form of

⁶ See Article 6 (4) of the Habitats Directive.

⁷ The purpose of this guidance is to assist Epsom & Ewell Borough Council, developers and residents in ensuring that the Borough’s biodiversity is both protected and enhanced when new development take place. This guidance is linked to the Epsom & Ewell Local Biodiversity Action Plan (EELBAP) and is an outcome of the EELBAP objectives.

irreplaceable habitat, as per Paragraph 118 of the National Planning Policy Framework. Trees and other planting including contiguous gardens and green oases, also provide an important habitat for wildlife, reduce levels of airborne pollution and increase the supply of oxygen. They also provide valuable shade in our built-up areas reducing the adverse impacts of the 'urban heat island' effect. Landscape design can be used to reduce surface water run off rates.

- 2.21 Many trees are already protected by Tree Preservation Orders, and we will continue to make Tree Preservation Orders where trees of environmental importance are threatened. Trees in Conservation Areas are, with some exceptions, automatically protected, as a six week notice period must be given in writing to the Council before any proposed works are carried out. Unauthorised works to protected trees can result in substantial fines. Where trees are felled, we will normally require that an appropriate replacement be planted. It is recognised that in some historic restoration schemes there may be some removal of trees. We will only consider exceptions to this approach on sites where it is demonstrated that it is not physically possible to introduce replacement landscaping and planting.
- 2.22 In some woodland areas periodic thinning and clearing may be necessary to ensure the ecological value of the wood. In streets it is important that species are chosen that are appropriate to the scale of their surroundings and public amenity. Where appropriate and practical we will require that new development incorporate new trees and other planting that enhance the Borough's treescape and wider biodiversity. These measures will contribute towards the development of the Borough-wide Green Infrastructure network. Where possible we will require the planting of semi-mature trees in order to ensure a higher rate of survival and resilience with an emphasis on native species.
- 2.23 The term "landscape" is taken to refer to the design of all space between buildings, and includes walls and boundaries and paving materials, as well as planting. These considerations are often vital in creating an appropriate setting to new developments and in integrating new development to its surroundings. Landscape design must form an integral part of any proposals and needs to be considered in relation to the development as a whole at the start of a project. It should also relate to the character of the area.

Policy DM5 Trees and Landscape

The Borough's trees, hedgerows and other landscape features will be protected and enhanced by:

- **Planting and encouraging others to plant trees and shrubs to create woodland, thickets and hedgerows;**
- **continuing to maintain trees in streets and public open spaces and selectively removing, where absolutely necessary, and replacing and replanting trees;**
- **requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include the planting of new semi-mature trees and other planting.**

Where trees, hedgerows or other landscape features are removed, appropriate replacement planting will normally be required. Consideration should be given to the use of native species as well as the adaptability to the likely effects of climate change.

Every opportunity should be taken to ensure that new development does not result in a significant loss of trees, hedgerows or other landscape features unless suitable replacements are proposed. Where removal is required, sound justification will be sought, supported by appropriate evidence such as health, public amenity, street scene or restoration of an historic garden. In the case of arboriculture evidence, this will be provided by a suitably qualified individual.

Open Space Provision

- 2.24 The Borough is fortunate in having a diverse mix of green spaces ranging from natural/ semi-natural areas to parks, gardens and formal recreational facilities. These open spaces and their landscaping provide relief from the density of urban form and contribute to an attractive urban character, appreciated by both residents and visitors. They distinguish the Borough from other places. These areas are valued assets that contribute to the Borough's wider Green Infrastructure network.
- 2.25 These green spaces make a valuable contribution to people's health and well-being and often have a multi-functional role, being havens for biodiversity as well as providing a range of leisure and recreational opportunities. The Strategic Open Space sites, including Nonsuch Park and the Hogsmill Local Nature Reserve, serve a wider area that extends beyond the Borough's boundaries. Equally, Epsom Common and Horton Country Park Local Nature Reserves, and the Epsom & Walton Downs are recognised as providing informal open space provision for the adjoining London Boroughs and north east Surrey Districts. Our open spaces add to the diversity of the landscape and are a key characteristic of the Borough. The open space network will be identified as part of the forthcoming Site Allocations Policy Document and on the Local Plan Proposals Map.
- 2.26 We will seek to retain our existing open space sites so that we can continue to meet local recreation needs. Proposals that would result in a net loss of recreational open space will only be considered in exceptional circumstances where they meet the criteria contained in Policy DM6. In such cases proposals will be accompanied by evidence that clearly sets out the reasons for releasing open space sites for redevelopment, and how any losses to provision will be made good. We will take a proactive, positive and collaborative approach to meeting the requirements of local schools. As per Paragraph 72 of the National Planning Policy Framework, the need to create, expand or alter schools will be given great weight in decision making.
- 2.27 Where it is appropriate and practical we will require that new development delivers additional open space provision to address identified shortfalls. On-site improvements will be delivered through the Section 106 process, whereas off-site improvements will be funded through the Community Infrastructure Levy. We will work with local communities and the development industry to ensure that new provision meets specific areas of open space need; is of an appropriate standard and is accessible to all potential users.

Gardens and several hundred veteran trees⁹. All of the Borough's known heritage assets at that time will be identified in the forthcoming Site Allocations Document. Additional assets may subsequently be identified by English Heritage or the Borough Council and these too will need to be taken into account under Policy DM 8 below.

- 3.8 Development proposals that involve or have an impact upon an identified Heritage Asset, or its wider setting, will be required to provide an assessment of the Asset, the potential impacts on the Asset and any appropriate mitigation measures that will be required.

Policy DM8 Heritage Assets

We will resist the loss of our Heritage Assets and every opportunity to conserve and enhance them should be taken by new development.

Development proposals that involve, or have an effect upon Heritage Assets must establish the individual significance of the Asset as part of the application or consent process. As part of the assessment process the significance of the Asset will be taken into account (namely whether it is a designated Heritage Asset* or a non-designated Heritage Asset) when determining whether the impact of any proposed development is acceptable.

Within Areas of High Archaeological Potential, as identified on the Proposals Map, or outside of these areas on any major development site of 0.4ha or greater, applicants are required to undertake prior assessment of the possible archaeological significance of the site and the implications of their proposals, and may be required to submit, as a minimum, a desk-based assessment to accompany any application. Where desk-based assessment suggests the likelihood of archaeological remains, the Planning Authority will require the results of an archaeological evaluation in order to inform the determination of the application.

We will from time to time review our Heritage Assets included on the Local Lists, with regard to the Historic Environment Record, in consultation with Surrey County Council.

*** Designated Heritage Assets comprise the following: Scheduled Ancient Monuments; Listed Buildings; Registered Parks and Gardens and Conservation Areas. Non-designated Heritage Assets identified by the Council are those buildings and structures identified as being of local importance and veteran trees.**

Townscape Character and Local Distinctiveness

- 3.9 A key aspect of sustainable development is that new development should enhance and complement local character, and be capable of integrating well into existing areas. For example, many of our existing built-up areas have a "leafy" visual character and appearance, which provides a distinctive natural or green infrastructure component to our urban environment. It is important that new development

⁹ Veteran trees are usually in the second or mature stage of their life. Our veteran trees are non-designated heritage assets that in many cases have been present in the local landscape/townscape for at least a hundred years. We are in the process of identifying our veteran tree stock; defining them on the basis of their aged appearance, size, condition, their cultural, landscape or biodiversity value.

continues to maintain and enhance this aspect through the incorporation of appropriate green amenity space, landscaping and other green infrastructure.

- 3.10 In order to help us define the qualities that make the Borough's different townscapes special the Council has carried out a number of studies to assess character and environmental quality. Conservation Area Appraisals and Management Plans have been produced for the 21 conservation areas in the Borough, while the remaining townscapes (excluding Epsom Town Centre) have been assessed through the [Environmental Character Study](#). These documents are working tools that we will use to plan for current and future development and to ensure that the aspects of positive local distinctiveness are protected and enhanced. Policy DM 9 must be read alongside these documents.
- 3.11 Some of areas of the Borough have a greater capacity to accommodate change and growth, whilst others are more sensitive to changes and may require a higher level of protection. The forthcoming Site Allocations Document will consider whether other areas of special character should also be defined.

Policy DM9 Townscape Character and Local Distinctiveness

We will use the Conservation Area Appraisals and Environmental Character Study to guide the assessment of development proposals.

We will seek enhancement of the townscape through new development, particularly those areas with poorer environmental quality and where the character has been eroded or needs improving.

Planning permission will be granted for proposals which make a positive contribution to the Borough's visual character and appearance. In assessing this we will consider all of the following:

- **compatibility with local character and the relationship to the existing townscape and wider landscape;**
- **the surrounding historic and natural environment;**
- **the setting of the proposal site and its connection to its surroundings; and**
- **the inclusion of locally distinctive features and use of appropriate materials**

Design

- 3.12 Good design is fundamental to help create places where people choose to live, work and visit. We are committed to securing high quality development that enhances life in the Borough and makes a positive contribution to the visual character and appearance of our different townscape areas. In order to achieve this objective we have already prepared a suite of development management policies that support of Core Strategy Policy CS5 by ensuring that new development does not harm the visual character and appearance of the Borough. Elsewhere in this document we set out our detailed development management approach towards our historic environments, townscape character and local distinctiveness, space standards and building heights. The following policy sets out how new development will incorporate the principles of good design. All of these polices must be read in conjunction with one another.

- 3.13 Our forthcoming Design Quality Supplementary Planning Document will be a useful tool in helping to maintain and improve the quality of the urban environment and should be referred to for additional detail and guidance on aspects of quality design.
- 3.14 Our priority is to create safe and secure environments, to reduce crime and the fear of crime by securing good design through the development management process. We will expect new developments to incorporate designing out crime principles from the outset. Where appropriate, development proposals will address the following issues: access and movement; structure; surveillance; ownership; physical protection; activity, and management and maintenance¹⁰.
- 3.15 We believe that making security a fundamental part of the design process at an early stage is essential. Once the development is built the main opportunity for applying crime prevention measures is lost. Early discussions provide an opportunity to make sure developments are designed with reducing the risk and the fear of crime in mind. Prospective applicants are advised to address crime prevention measures either within their accompanying Design and Access Statement or a separate Crime Impact Statement, in order to demonstrate how these have been considered and how the design reflects the attributes of safe, sustainable places set out in government guidance on reducing the risk of crime through building design.
- 3.16 We will continue to work with Surrey Police's Crime Prevention Design Adviser on those proposals that merit their involvement. Developers of major proposals are advised to consult Surrey Police at the pre-application stage, and if necessary submit an audit alongside their application to show that all crime prevention concerns have been considered.
- 3.17 We place great importance on the protection of the existing high standard of amenity enjoyed throughout the Borough's established residential areas. As a consequence, careful consideration will be given to applications for housing on sites other than those allocated in the Site Allocations Document.
- 3.18 During the Plan period in addition to our allocated housing sites, there will also be opportunities for new "windfall" housing to come forward within the Borough's existing urban area. These may include development proposals that infill vacant plots, or that redevelop sites previously in commercial or community use that have become redundant. Collectively these windfall development opportunities will contribute to meeting our housing needs. However, we must ensure that they do not have a cumulative harmful impact on the character, appearance and amenity of the area as a whole. Development Management Policy DM 16 sets out how we will ensure that proposals involving backland or infill sites do not have an adverse impact on the wider townscape.
- 3.19 Open estate layouts and mature domestic gardens are a key component of many of our established residential areas, with vegetation contributing to the streetscene and providing biodiversity value. Excessive increases in the density of these areas can result in over-development or "town cramming", which you have told us damages residential amenity. In order to minimise harm, we will normally expect proposals for new development to be comprised of a comparable plot frontage and depth to those in the immediately adjoining area. Where we have concerns about the potential impact of a new development on the wider streetscene, we will seek the submission of appropriate visualisations that illustrate how it will respect its surrounding context.

¹⁰ These are set out in greater detail in "Safer Places - the Planning System and Crime Prevention" (ODPM/Home Office, 2003)

Our policy on housing density is set out under Development Management Policy DM22.

- 3.20 Homes are particularly vulnerable to overlooking from new residences in and adjacent to rear gardens. In order to minimise this problem, new development proposals on infill and backland sites will be designed so that their height does not exceed that of the adjacent development. In many of our residential areas single storey developments may provide the most appropriate solution. Equally as a general principle, we will encourage new developments to provide a distance of at least 21 metres of separation between opposing properties. Other measures, such as obscured glazing may also be appropriate.
- 3.21 Householder developments such as domestic extensions account for most of the planning applications received in the Borough. Changes to the General Permitted Development Order mean that most modest single storey householder extensions no longer require planning permission. However, we strongly recommend that householders contemplating an extension to their home contact us beforehand to establish whether permission is required. We also recommend that householders obtain a Certificate of Lawful Development prior to the commencement of such developments.
- 3.22 In order to help householders with the design of their developments, and also to aid Members and Officers in determining proposals we have prepared [Householder Applications Supplementary Planning Guidance](#), which provides more detailed advice. This guidance will be updated and incorporated within our forthcoming Design Quality Supplementary Planning Document.
- 3.23 As with all forms of development we will seek designs that fit in well with the neighbourhood and surroundings, and we will resist householder proposals that detract from the visual amenity of the wider townscape. We will assess householder development proposals for their impact on the amenity and the character of the area; on the wider townscape; the relationship between buildings; and the spaces being created.
- 3.24 Our principle concerns in considering the design and siting of house extensions are:
- a) the relationship between the extended dwelling and the adjoining dwellings as they affect the streetscene;
 - b) the spaces between individual dwellings as they affect the character of the area; and
 - c) the spaces between individual dwellings as they affect habitable rooms and kitchens (habitable rooms include all bedrooms, living rooms and dining rooms).
- 3.25 Whilst there is a general requirement for development to adopt appropriate materials and design, we are particularly concerned with protecting the visual character and appearance of our residential areas. Householder extensions should match the original dwelling where possible and practical. They will otherwise need to fit in with the style of their surroundings. Where necessary, particularly within Conservation Areas, we will require householder extensions to be built of traditional or locally distinctive materials that are appropriate to the original building and the wider townscape. The Conservation Area Appraisals and the Environmental Character Study provide an indication of the variety of building materials that characterise our different townscapes. We actively encourage householders who are contemplating

extensions, whether they require planning permission or not, to discuss building proposals and materials with us at an early stage.

Policy DM 10 Design Requirements for New Developments (including House Extensions)

Development proposals will be required to incorporate principles of good design. The most essential elements identified as contributing to the character and local distinctiveness of a street or area which should be respected, maintained or enhanced include, but are not limited, to the following:

- (i) prevailing development typology, including housing types and sizes;**
- (ii) prevailing density of the surrounding area;**
- (iii) scale, layout, height, form (including roof forms), massing;**
- (iv) plot width and format which includes spaces between buildings;**
- (v) building line; and**
- (vi) typical details and key features such as roof forms, window format, building materials and design detailing of elevations, existence of grass verges etc.**

Development proposals should also:

- (vii) be adaptable and sustainability designed, subject to aesthetic considerations;**
- (viii) incorporate the principles of safe design to reduce the risk and fear of crime, e.g. natural surveillance, appropriate levels of lighting;**
- (ix) have regard to the amenities of occupants and neighbours, including in terms of privacy, outlook, sunlight/daylight, and noise and disturbance;**
- (x) ensure that the development incorporates an appropriate layout and access arrangements for servicing the completed development from adjoining highway and pedestrian networks;**
- (xi) where appropriate their design and layout must not prejudice the development potential for similar proposals on neighbouring plots;**
- (xii) have regard to the public realm and to ways in which it can be enhanced as an integral part of the design of the development; and**
- (xiii) avoid locating structures, including, e.g. telecommunications equipment and building plant where they will be visually intrusive and likely to result in an adverse effect on the character and visual amenities of the local and wider area.**

Further detailed guidance relating to residential developments, including householder developments, is included in our Design Quality Supplementary Planning Document¹¹.

Housing Density

3.26 Making the most efficient use of our urban land is a key consideration in planning for future housing in Epsom & Ewell. This is because our Housing Land Supply Strategy for the remaining Plan Period seeks to protect our current Green Belt boundary by

¹¹ It is anticipated that the Design Quality Supplementary Planning Document will be published for initial consultation during Summer 2013.

directing all new housing to suitable sites within the existing urban area¹². The forthcoming Site Allocations Policies Document will set out a series of housing site allocations that will, in concert with existing allocations¹³, deliver all of the new housing required to meet our local needs.

- 3.27 In addition to these allocated sites, we envisage that there will be a modest number of housing windfalls, which will provide the Borough with an additional buffer, as recommended by national planning policy. According to our evidence, we believe that there are enough appropriate housing windfall sites within the existing urban area to provide a sufficient supply of new homes to ensure choice and competition in the market for land. However, in planning for the redevelopment of these sites we will need to balance the desire to optimise the number of new houses built against our objective of protecting the Borough's special visual character and appearance. Ensuring that new housing is developed at an appropriate density is a key factor in the design process.
- 3.28 The Borough's existing urban area has a wide variety of development densities. The Borough-wide Environmental Character Study and Conservation Area Appraisals provide a detailed assessment of development patterns. Epsom Town Centre, Ewell Village and the other larger local centres tend to be comprised of a mix of commercial and residential uses, and have good access to public transport, which has encouraged higher development densities. In contrast, many of the Borough's predominantly residential areas are suburban in character and tend to have lower housing densities.
- 3.29 Previously, national and regional planning policy has sought to set minimum housing densities. Since 2010, local planning authorities have had greater flexibility in defining housing density at the local level. In concert with our other development management design policies (set out above), our new housing density policy seeks to ensure that new development does not harm the visual character and appearance of the surrounding townscape.
- 3.30 Prospective developers will be requested to demonstrate how their proposals either maintain or enhance the character and appearance of the surrounding townscape. In order to do this, they will need to contextualise their proposals through visualisations that set the proposed housing within the wider townscape context. We recommend that prospective developers discuss these issues through the pre-application process in order to minimise potential delay and unnecessary additional cost during the planning application process.
- 3.31 Based on our evidence, we envisage that a maximum density of 40 dwellings per hectare will be appropriate for most housing windfall sites. Developing housing sites to the maximum density will not be appropriate in all circumstances.
- 3.32 Given the nature of housing windfall sites; namely that it is not possible to predict where and when they may come forward for redevelopment, there may be opportunities to consider higher densities subject to their location. In those exceptional circumstances when higher densities may be considered appropriate we will require the prospective developer to demonstrate overall sustainable qualities of the site that would justify densities above 40 dwellings per hectare. We will also

¹² The only exception to this approach are the small number of redevelopment sites that remain on the Hospital Cluster – most notably West Park North and South, both of which are identified as housing allocation sites in the forthcoming Site Allocations Policies Document.

¹³ This refers to the housing and mixed-use allocation sites identified in Plan E Epsom Town Centre Area Action Plan.

require that the applicant demonstrates that the surrounding townscape has sufficient capacity to accommodate a new development of higher density. Developers will evidence their proposals using an established townscape assessment methodology such as that used in the Environmental Character Study.

Policy DM 11 Housing Density

We will, in principle, support proposals for new housing that make the most efficient use of development sites located within the Borough's existing urban area.

Proposals for new housing must demonstrate how the density of development would contribute towards maintaining and enhancing the visual character and appearance of the wider townscape and lead to no net loss of biodiversity.

The density of new housing developments will in most cases not exceed 40 dwellings per hectare. We will consider exceptions to this approach where:

- **The development site has been identified in the Site Allocations Policies Document as being appropriate for a higher density; or**
- **It can be demonstrated that the site enjoys good access to services, facilities and amenities via existing public transport, walking and cycling networks; and**
- **The surrounding townscape has sufficient capacity to accommodate developments of higher density.**

Housing Space Standards

- 3.33 The provision of sufficient living space within new homes is an important element of good housing design and a prerequisite for basic living. We believe that the future residents of new homes should be provided with sufficient space for day to day activities and needs. This will include space for the furniture they need, to store personal possessions, to prepare food conveniently or to socialise with friends and family. If homes are to have a long life, they must offer functional and adaptable spaces that meet the needs of families, children, older people and disabled residents.
- 3.34 It is recognised that adequate space in the home has an effect on health, diversity and community cohesion and that insufficient space provision in the housing stock will therefore impact on local services. It is an important issue for new development taking place in the Borough not only due to the scarcity of housing land supply but also to prevent substandard accommodation in small units in the private housing sector. It is important that we make efficient use of land and at the same time cater for changing lifestyles, including increasing the opportunities for home working, and meeting with requirements for Lifetimes Homes and Building Regulations¹⁴; specifically in relation to access.
- 3.35 Our forthcoming Design Quality Supplementary Planning Document will set out standards for amenity space. These will be general guidelines as the type and size of space will vary according to the size and use of the dwelling. Provision should ensure a balanced range of public, communal and private space. The biodiversity potential/ value, aspect, usability, sense of enclosure and prevailing pattern established by local character will all be taken into account in assessing whether private gardens will provide sufficiently good living conditions. For houses a minimum total private outdoor space of 70m² for 3 or more beds and 40m² for 2 beds will be

¹⁴ Part M of the Building Regulations sets out the level of access required for disabled users.