

Plan E Self Assessment of Soundness

This document uses the self-assessment toolkit published by Planning Advisory Service (PAS) to assess the soundness of Plan E. Whilst not an essential requirement for submission of the AAP it is recommended that this exercise is undertaken to assist the Planning Inspector in the examination.

Soundness tool

| Key question | Evidence provided (reference numbers for supporting documents are in brackets) |
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| Justified | |
| Participation | |
| 1. Has the consultation process allowed for effective engagement of all interested parties? | Yes, the Regulation 30 Consultation Statements (d & e) provide a summary of the continuous engagement activities, during the production of Plan E. |
| Research/ fact finding | |
| 2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it? | <p>Plan E has been informed by a variety of evidence, including the consultation responses, sustainability appraisal and a number of evidence base documents. The following documents help show how these were considered throughout the process:</p> <ul style="list-style-type: none"> • Matrices to document decision making process (g1) • Supporting statements for Submission Paper policy development (g2) • Summary of findings from evidence base relevant to Plan E (g3) <p>Other sources: Sustainability Appraisal Report (a) and Consultation Statement (d & e)</p> <p>The process was iterative with new evidence being gathered as the need was identified (for example the testing of highways options). Therefore it is considered that the policies are justified by evidence.</p> |

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| <p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p> | <p>Economic cycles may influence the potential levels of investment during the Plan E period, resulting in peaks and troughs in the delivery of new housing and employment levels.</p> <p>Plan E is considered to be a long term strategy which is flexible and can accommodate variations in economic cycles.</p> |
| Alternatives | |
| <p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p> | <ul style="list-style-type: none"> • The Issues Paper (2008) (g8) and Issues and Options paper (2009) (g9) <p>These Consultation Papers identified alternative approaches, and provide some evidence as to why certain options were selected.</p> <ul style="list-style-type: none"> • Matrices to document decision making process (g1) <p>The Matrices show how the consultation responses, sustainability appraisal and other relevant evidence were considered in the selection of options. Options were explored further at the Members workshop where a paper was produced setting out the alternative approaches and the implications of taking each option forward.</p> |
| <p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p> | <ul style="list-style-type: none"> • Sustainability Appraisal Report (a) <p>Plan E is a mechanism for the delivery of the Core Strategy Policy CS14. The Core Strategy was subject to sustainability appraisal, which has been used to inform the appraisal of Plan E and scope the issues.</p> |

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| | <p>An initial sustainability appraisal was conducted during the development of the Issues & Options Paper, which was used to help shape the Submission Document. The final Sustainability Appraisal Report documents this process.</p> |
| <p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p> | <ul style="list-style-type: none"> • Statement of Legal Compliance <p>This supporting document shows how relevant national, regional and local policies have been taken into account in the development of Plan E.</p> <ul style="list-style-type: none"> • South East of England Partnership letter Regulation 29 (f) <p>The Partnership Board have confirmed that Plan E is in general conformity with the South East Plan.</p> <ul style="list-style-type: none"> • Representation from Surrey County Council (f) <p>This representation states that Plan E is reasonably consistent in relation to the policies and plans of the County Council.</p> |

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| Effective | |
| Deliverable | |
| <p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p> | <p>Plan E's overarching vision is drawn from the Council's adopted Core Strategy policy CS14, which is inline with the Community Strategy</p> <ul style="list-style-type: none"> • The Issues Paper (g8) • The Issues and Options Paper (g9) <p>These consultation papers helped to build on the Core Strategy through identifying and confirming the issues faced by the Town Centre and by developing more focussed visions for key areas of the Town Centre. During this process, objectives and actions were identified and refined to help address the issues and deliver the options.</p> <p>Within the Submission Document the key issues and objectives are set out in chapter 2, the focussed visions in chapter 3, while the rest of the plan sets out how these will be addressed / delivered.</p> |
| <p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p> | <p>The influence of town centres in neighbouring Boroughs has been considered. This is particularly relevant to retail issues and was considered as part of the Council's Retail Study.</p> <p>Ensuring Epsom Town Centre remains accessible to the workforce and visitors from both within and outside the Borough is a consideration.</p> |
| <p>16. Does the development plan document contain clear objectives?</p> | <p>The Submission Document identifies clear objectives, which are related to the overarching vision set out in the Core Strategy. This is elaborated on through identifying more specific visions for key areas within the Town Centre.</p> |

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| <p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p> | <p>Plan E is a truly spatial plan which has aimed to take account of the way the Town Centre functions as a whole. A SWOT¹ analysis in the Issues Paper helped to identify the main issues at an early stage in Plan E's development (for example movement, character and building heights). The objectives have been developed to specifically address these issues (set out in chapter 2 of the Submission Document); while the visions set out how key areas of the Town Centre will evolve.</p> |
| <p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p> | <p>The objectives in the Submission Document (chapter 2) are set out under the headings of Land Use, Movement & Accessibility, Public Realm & Public Spaces and Identity, Character and Management. These broadly correspond with the section headings relating to the main policies within Plan E, which are the delivery mechanisms. Additionally, the implementation table identifies how the policies are linked to the objectives</p> <p>As Plan E relates to the Town Centre only, it is considered appropriate for some policies to be set out in Borough wide LDF documents (such as the forthcoming Delivery DPD), for example those relating to carbon reduction targets and meeting specific housing needs such as for gypsy and travellers. Therefore, there are not considered to be any gaps.</p> |
| <p>21. Are there realistic timescales related to the objectives?</p> | <p>Within the Submission Document Appendix 3 sets out an indicative timeframe for the delivery of the Plan E policies, which are linked to the objectives. Appendix 4 sets out the delivery and phasing in the infrastructure delivery plan. This also includes a risks and contingencies column.</p> |
| <p>22. Are the policies internally consistent?</p> | <ul style="list-style-type: none"> • Supporting statements for Submission Paper policy development (g2) <p>The policies are considered to be consistent with one another and this supporting paper sets out how some of the policies were developed. For example, it shows how the housing target for the Town Centre has been identified, and how this is consistent with the opportunity sites.</p> |

¹ Strengths, weaknesses, opportunities and threats

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| <p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? | <p>Plan E is well placed in the LDF. It is a key vehicle to deliver the Core Strategy policy on Epsom town centre, which is drawn from the Community Strategy. It does not contain any policies which are applicable across a wider area, as these are either contained within national / regional policies, the Core Strategy or will be within the Delivery DPD. However, the opportunity was taken to test various policy options during the consultation on Plan E, which may be applicable to the wider Borough.</p> <p>Plan E is a truly spatial strategy identifying how issues can be addressed which do not traditionally fall under the remit of the planning system (for example, the issue of Town Centre Management). However, it is considered necessary to address such issues to ensure a comprehensive approach. For example it has been identified that to help secure Epsom's long term vitality and viability, qualitative improvements need to be made to the retail offer and Town Centre environment, rather than large scale expansion. Such improvements can only be achieved through a multi strand approach including improved Town Centre Management.</p> |

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| <p>24. Does the development plan document explain how its key policy objectives will be achieved?</p> | <p>The focus of the document is on delivery. The policies and other actions identified will help deliver the visions and objectives. The LSP has an Economic Delivery Group which will help focus the delivery of Plan E. The monitoring schedule will help track progress.</p> <p>In addition, there are other mechanisms not specified in Plan E which will assist in its delivery. For example, funding has been secured from the Improvement and Efficiency South East (IESE), for a project which aims to establish a 'sustainable partnership structure and approach to assist the delivery of objectives for Epsom Town Centre, whilst supporting the achievement of relevant Local Area Agreement targets for Surrey.' The Council is also actively working with the Business Partnership and wider business community to pursue the introduction of Town Centre Management.</p> |
| <p>25. If there are development management policies, are they supportive of the strategy and objectives?</p> | <p>The Submission Document contains policies for a number of opportunity sites within the Town Centre, which will be instrumental in helping to deliver the strategy. Additionally, policies such as the height policy will help shape future development to ensure it reinforces the distinctive character of the Town Centre.</p> |
| <p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p> | <p>Engagement with infrastructure providers has been undertaken and numerous responses received. These have been taken into account when developing Plan E.</p> <p>Plan E contains an Infrastructure Delivery Plan in Appendix 4.</p> |
| <p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p> | <p>Appendix 3 of the Submission Plan E contains an implementation plan, which identifies (where applicable) the policy delivery partners and the indicative timescale for delivery. Appendix 4 contains an Infrastructure Delivery Plan, which again identifies the lead delivery agencies and timeframes.</p> |

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| <p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p> | <p>This is set out in the Infrastructure Delivery Plan in Appendix 4 of the Submission Document. This has a column identifying the lead delivery agency and a timescale attached to each scheme.</p> <p>Surrey County Council have commissioned consultants to produce a Surrey Infrastructure Capacity Project, which Epsom & Ewell Borough Council are actively involved in. This study is currently underway and will inform the Infrastructure Delivery Plan.</p> |
| <p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p> | <p>The delivery of Plan E cannot be achieved by the Council alone. It is a partnership document. Appendix 3 and 4 of Plan E outline who the main delivery partners are.</p> <p>There are a number of key infrastructure providers who are part of the LSP (for example Surrey Highways). The LSP Economic Delivery Group will help focus the delivery of Plan E.</p> |

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| <p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p> | <p>Yes. Plan E has drawn on a variety of plans, programmes and documents to deliver a truly spatial document. It considers the way the town centre functions as a whole and identifies how it will change and develop over the next 20 years, considering not only development sites, but also how to maximise the potential of the existing fabric of the Town Centre.</p> |
| <p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p> | <p>Plan E provides a framework for change in the Town Centre and over the Plan E period, it is likely that circumstances will vary. The document aims to be flexible to take account of this.</p> <p>For example;</p> <p>The delivery of the key opportunity sites is staggered over the period to reflect the complexity of the issues relating to each site. In addition, a development brief will be produced for each to assist in their delivery.</p> <p>The document clearly signposts the need for Town Centre Management, although there is flexibility with regard to the funding mechanism, as this may vary with economic circumstances.</p> <p>The Infrastructure Delivery Plan in Appendix 4 contains a column which identifies risks and contingencies for each of the schemes and proposals in Plan E.</p> |

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| Flexible | |
| <p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p> | <p>Actions will be assessed against the indicative timescales set out in Appendix 3. Monitoring will be overseen by the management regime and annual reporting will highlight the success or failure of policies, and the potential need for any reviews. However, the approach is considered to be flexible, within reason.</p> <p>For example;</p> <p>Policy E13 (changes to the road network) sets out a stepped approach to potential changes, which would be informed by the monitoring of the success of other actions.</p> <p>The Plan sets out the need for a management regime to be established for the Town Centre. Having such management ‘infrastructure’ in place will allow the town centre to address issues that may arise in a more co-ordinated fashion.</p> <p>A flexible approach has been taken with regard to employment in the Town Centre, allowing for high density employment uses to come forward, while enabling the loss of less ‘fit for purpose’ stock.</p> |
| <p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p> | <p>Plan E focuses on a relatively small area of the Borough, although the opportunity sites identified within the document will form an important source of housing supply. The needs for housing have been balanced against the needs for other uses, such as employment and retail. However, policy E2 specifies the amount of housing units to be delivered from within the Town Centre as a range, to provide flexibility.</p> <p>While the policies for the redevelopment of the opportunity sites are quite prescriptive, the policies set out the community’s aspirations for the sites and provide a valuable starting point. The proposed development briefs will focus on how this will be achieved, working with land owners to ensure a comprehensive approach. Should circumstances change the site requirements could be ranked and / or varied to ensure priorities will be met.</p> |

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| 36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing? | Appendix 3 sets out the monitoring regime for Plan E. This also specifies targets where applicable. Monitoring of these targets will help identify where policies may be failing and provide the opportunity for appropriate action to be taken. The establishment of a more robust management regime will also assist in the ability to address issues and take action. |
| Monitoring | |
| 37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations? | Appendix 3 of Plan E contains an implementation table that contains targets and indicators that relate directly to the delivery of the policies |
| 38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report? | All targets in the implementation table of Plan E will be monitored and where relevant, reported on in the Annual Monitoring Report. |
| 39. Are suitable targets and indicators present (by when, how and by whom)? | Yes. These are contained in the implementation table in Appendix 3. |
| National policy | |
| 40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy? 41. If yes, is there a local justification? | All policies within Plan E are considered to be consistent with national planning policy. |
| 42. Does the development plan document contain policies that do not add anything to existing national guidance? 43. If so, why have they been included? | No. Plan E aims not to repeat policies in National Guidance or other higher level planning policies. The policies are considered to be locally distinctive. |

